DATE: 09/19/07

TO: Distribution

FROM: Paul Persing

SUBJECT: Weekly Hazardous Waste Management Inspection

INSPECTION DATE: September 19, 2007

#### 90 DAY ACCUMULATION TANKS

|             | Date Last      |                 |
|-------------|----------------|-----------------|
| <u>Tank</u> | <u>Emptied</u> | <u>Due Date</u> |
| VT-245      | 07/13/07       | 09/21/07        |
| VT-130      | 08/14/07       | 10/23/07        |
| VT-132      | 08/14/07       | 10/23/07        |
| VT-602      | 07/04/07       | 09/12/07        |

#### **BOILER TESTS (BIF)**

|                          | Date Last |                 |
|--------------------------|-----------|-----------------|
| Shutdown                 | Tested    | <u>Due Date</u> |
| Residue Flow & Leak Test |           |                 |
| BL#1                     | 09/04/07  | 10/04/07        |
| BL#2                     | Shut down |                 |
| CO ppmy                  |           |                 |
| BL#1                     | 09/11/07  | 09/18/07        |

#### <u>Residue Samples</u> 06/29/07 09/27/07

On Gas

| Quarterly calibration e | rror test (First Friday of Quarter) |          |
|-------------------------|-------------------------------------|----------|
| CO                      | 06/20/07                            | 09/18/07 |
| NOx                     | 06/20/07                            | 09/18/07 |
| O2                      | 06/20/07                            | 09/18/07 |
| Opacity                 | 06/20/07                            | 09/18/07 |

#### STORAGE TANK HIGH LEVEL ALARM TEST

BL#2

|             | Date Last |                 |
|-------------|-----------|-----------------|
| <u>Tank</u> | Tested    | <u>Due Date</u> |
| VT-621      | 07/03/07  | 06/22/08        |
| VT-622      | 07/03/07  | 06/22/08        |
| VT-701      | 07/03/07  | 06/22/08        |

#### STORAGE TANK ANNUAL EMPTY

|        | Date Last      |                 |
|--------|----------------|-----------------|
| Tank   | <u>Emptied</u> | <u>Due Date</u> |
| VT-621 | 02/22/07       | 01/23/08        |
| VT-622 | 02/22/07       | 01/23/08        |

#### SEE OTHER SIDE FOR HAZARDOUS & RESIDUAL WASTE ISSUES & OTHER COMMENTS.

#### Distribution:

| W. J. Belter | B. Elswick    | D. Martir |
|--------------|---------------|-----------|
| J. White     | L. Kemigan    | D. Danc   |
| W. Devine    | G. E. Hessler | B. Comv   |
| J. Lynch     | A. Skramstad  |           |

L DeFulio D. Sekel

L. Fisher Production Foremen

# Annual Used Oil Sample from Maintenance Tote(s)

| Last Taken | Take by    |
|------------|------------|
| 12/01/06   | 11/16/2007 |

#### **Annual NPDES Inspection**

| nspected | Inspect by |
|----------|------------|
| 11/08/06 | 10/24/2007 |

#### Replace Acid Tote

Source:

flow through verififcation demonstration flow through verififcation demonstration

# Last change: Internal Due Date to change: 11/14/2006 10/30/2007

#### Replace Carbon Drum on Wastewater Pits

| Date: Offli          | ine Online |        | Due for chang<br>(internal limit<br>18 days) |
|----------------------|------------|--------|--|
| Unit 2 Phenol Sump   |            |        |  |
| FN-200 A             | 9/4/07     |        |  |
| FN-200 B             |            | 9/4/07 | 9/22/07                                      |
| Unit 2 Non-phenolic  |            |        |  |
| FN-201A              | 9/4/07     |        |  |
| FN-201B              |            | 9/4/07 | 9/22/07                                      |
| Unit 3 Phenol Sump   |            |        |  |
| FN-300A              | 9/4/07     |        |  |
| FN-300B              |            | 9/4/07 | 9/22/07                                      |
| Uni1 AMS Phenol Sump |            |        |  |
| FN-106A              | 9/4/07     |        |  |
| FN-106B              |            | 9/4/07 | 9/22/07                                      |

#### HAZARDOUS & RESIDUAL WASTE MANAGEMENT ISSUES

| Department<br>Responsible | Area                                   | Issue  | Action<br>Taken (T) / Required (R)                    | Target<br>Due Date | Person(s) contacted to correct problem |
|---------------------------|--|--|---|--------------------|--|
| Operations                | Unit 2 phenol pit                      | Bottles on sump lid and caps                             | (R) Place waste in drum                               | 9/20/2007          | Tito Roman                             |
| Operations                | Track 10 & 11                          | Glass bottles on curb                                    | (R ) Crush and dispose bottles                        | 9/20/2007          | Tito Roman                             |
|                           |  |  |   |                    |  |
| Previous: Please note t   | hat the highlighted ones a             | re still open.   |   |                    |  |
| Operations                | PR2                                    | VT-602 approaching 90 days accumulation period           | (T) Coordinate to empty VT-602                        | 9/14/2007          | T. Dwomik                              |
| Operations                | Track 10&11                            | Glass bottles on curb                                    | (R ) Crush and dispose bottles                        | Open               | T. Dwomik                              |
| Maintenance               | Fluorescent Lamps<br>Accumulation Area | Drum with lamps with label indicating accumulation date. | (R) Put lable on drum and indicate accumulation date. | 9/14/2007          | J. Gamble                              |

# FRANKFORD PLANT HAZARDOUS WASTE INSPECTION FORM PLACE "X" IF AREA IS DEFICIENT (MAKE COMMENTS BELOW)

INSPECTED BY: Paul Persing DATE: 09/19/07 TIME: 11:00 AM CONTAINER STORAGE INVENTORY
Hazardous 50
Residual 103

|                                     | LEAKS<br>FROM<br>TANKS | DIKE CONDITION<br>(CRACKS, HOLES,<br>ETC.) | CONTAINER<br>CONDITION<br>(BULGING, RUST,<br>LEAK, ETC.) |       | PROPER<br>LABELING<br>(DATE, ID, ETC.) |             | REACTIVES IN<br>SECTION B?<br>ALL OTHERS IN<br>SECTION A? | UNSHIPPED<br>DRUMS IN<br>WAREHOUSE | ANY SPILLS<br>OF MATERIAL | PALLETS<br>IN POOR<br>CONDITION |
|-------------------------------------|------------------------|--|--|-------|--|-------------|---|------------------------------------|---------------------------|---------------------------------|
| UNIT NO. 2:                         |                        |  |  |       |  |             |   |                                    |                           |                                 |
| CHP FILTER AREAS                    | DK                     | ок   |  | OK    |  |             |   |                                    |                           | ок                              |
| EAST PROCESS ACCUMULATION POINTS    | OK                     | ok   |  | ок    |  |             |   |                                    |                           | OK OK                           |
| WEST TANK ACCUMULATION POINTS C     |                        | ок   |  | OK OK | ok<br>ok                               |             | N/A   |                                    |                           | OK OK                           |
| VT-245                              |                        | ok<br>ok                                   |  | OK .  | ok .                                   |             | N/A   |                                    |                           | ok .                            |
| UNIT 2 TANK FARM C                  |                        | OK   |  |       | OK .                                   |             | N/A   |                                    |                           | ok .                            |
| TANK FARM DIKE VALVES O             |                        | OK .                                       |  | ок    | ok .                                   |             | N/A   |                                    |                           | ок                              |
|                                     |                        |  |  |       |  |             |   |                                    | No                        |                                 |
| UNIT NO. 3: CHP FILTER AREAS        | OK                     | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
| EAST TANK ACCUMULATION POINTS       | OK                     | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                |                           | ок                              |
| UNIT 3 TANK FARM                    |                        | ок   |  | ок    |  |             | N/A   |                                    |                           | ok                              |
| TANK FARM DIKE VALVES               | OK                     | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ok                              |
| DOU EDUOUSE.                        |                        |  |  |       |  |             |   |                                    |                           |                                 |
| BOILERHOUSE: BOILERHOUSE            |                        | ок   | ок   | ок    | ок                                     |             | N/A   |                                    |                           | ок                              |
| LAB WASTE DRUMS                     |                        | ОК   | ок   | ок    | ок                                     |             | N/A   |                                    |                           | OK OK                           |
| VT-701 OIL TOTES CONTAINMENT VALVE  | JK                     | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | OK                              |
| OTHER PLANT AREAS:                  |                        |  |  |       |  |             |   |                                    |                           |                                 |
| PR-20                               | N/                     | OK .                                       | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
| PR-2 TANK FARM                      |                        | OK   | ok ok  | OK .  | ок                                     | N/A         | N/A   | N/A                                |                           | OK .                            |
| MAINTENANCE SHOP                    |                        | OK .                                       | OK OK  | OK OK | OK OK                                  | N/A         | N/A   | N/A                                |                           | OK                              |
| MAINTENANCE YARD                    |                        | OK OK                                      | ок   | OK .  | ок                                     | N/A         | N/A   | N/A                                |                           | ОК                              |
| VT-602                              |                        | pk   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                |                           | ок                              |
| VT-130                              | OOS OK                 | ок   | ОК   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ОК                              |
| VT-132                              |                        | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
| STOREROOM                           |                        | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
| GARAGE(Firehouse)                   |                        | ок   | ОК   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
| Acet. Filt @ high purity tank farm  |                        | ок   | ок   | ок    | OK                                     | N/A         | N/A   | N/A                                |                           | ок                              |
| UNIT 1 TANK FARM                    | OK                     | СК   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                |                           | ок                              |
| TANK FARM DIKE VALVES               | OK                     | ок   |  | ok    | ок                                     | N/A         | N/A   | N/A                                |                           | ок                              |
| OX-801                              | OK                     | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                |                           | ОК                              |
| OX-501                              |                        | ок   | ок   | ок .  | ок                                     | N/A         | N/A   | N/A<br>N/A                         | No.                       | ок                              |
| OX-401<br>LEAD ACID BATTERY SHED    |                        | ок   | ок   | ок    | ок                                     | N/A<br>N/A  | N/A   | N/A                                |                           | ok .                            |
| Drum Pad                            |                        | ОК   | OK   | N/A   | OK<br>OK                               | N/A         | OK  | N/A                                | No                        | OK                              |
| Diam radi                           | <u> </u>               | <del> </del>                               | ox.  | N/A   | , , , , , , , , , , , , , , , , , , ,  | THE .       | OK  | INA                                | 140                       | <u> </u>                        |
| CONTAINER STORAGE AREA:             |                        |  |  |       |  |             |   |                                    |                           |                                 |
| STILES STREET                       | N/A                    |  |  |       |  |             |   |                                    |                           |                                 |
| CATOX Substation/bulbs              |                        | ок   | ок   | N/A   | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
|                                     |                        |  |  |       |  |             |   |                                    |                           |                                 |
| RESIDUE STORAGE TANKS:              |                        |  |  |       |  |             |   |                                    |                           |                                 |
| VT-621                              | 16' 1" OK              | OK   | ок   | OK    | OK                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
| VT-622                              | 14' 1" OK              | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
|                                     |                        |  |  |       |  |             |   |                                    |                           |                                 |
|                                     |                        |  |  |       |  |             |   | <u></u>                            |                           |                                 |
| LOADING AREA/ACCUMULATION POINT:    |                        |  |  |       |  |             |   |                                    |                           |                                 |
| WAREHOUSE #9                        | OK                     | OK .                                       | ок   | ок    | ок                                     | ок          | N/A   | N/A                                | No                        | ок                              |
| UNLOADING AREA: VAC Truck DECON PAD | OV.                    |  | <del> </del>   |       |  | <del></del> | l   | ļ                                  | <del> </del>              |                                 |
|                                     |                        | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
| Tracks 10&11 South                  | UK                     | ок   | ок   | ок    | ок                                     | N/A         | N/A   | N/A                                | No                        | ок                              |
| L                                   |                        | <del></del>                                |  | 1,    |  | l           | L   | L                                  |                           |                                 |

## **Plant Dumpsters**

|    | Dumpster  | Date      | Remove   |                  |       |                        |          |
|----|-----------|-----------|----------|------------------|-------|------------------------|----------|
| #  | Number    | Generated |          | Contents         | Owner | Location               | Comments |
| 1  | C40056    |           |          | Asbestos         |       | Behind Trash Compactor |          |
| 2  | FCI-01129 | 01/31/07  |          | Concrete         |       | Roll Off Pad           |          |
| 3  | FCI-01140 |           |          | Kiln Dust        |       | Behind dispensory      |          |
| 4  | FCI-01141 | 07/05/07  | 06/19/08 | Fiberglass/Wood  |       | West of OX-501 Dike    |          |
| 5  | FCI-0166  | 07/31/07  | 07/15/08 | Concrete/Asphalt |       | Roll Off Pad           |          |
| 3  | FCI-0406  | 07/31/07  | 07/15/08 | Concrete/Asphalt |       | Track 10&11            |          |
| 7  | FCI-0460  | 04/02/07  | 03/17/08 | Wood and Plastic |       | Roll Off Pad           |          |
| 3  | FCI-0470  | 11/15/06  | 10/31/07 | Lumber/Wood      |       | Roll-Off Pad           |          |
| 9  | FCI-0475  |           |          | Empty            |       | Roll-Off Pad           |          |
| 10 | FCI-0479  | 05/31/07  | 05/15/08 | Concrete         |       | Rool-Off Pad           |          |
| 11 | FCI-0519  |           |          | Empty            |       | Roll-Off Pad           |          |
| 12 | FCI-1320  | 08/13/07  | 07/28/08 | Concrete         |       | Unit #3 South          |          |
| 13 | FCI-9432  | 10/30/06  | 10/15/07 | Concrete         |       | Roll-Off Pad           |          |
| 14 | FCI-9495  | 08/16/06  | 08/01/07 | Concrete         |       | Roll-Off Pad           |          |
| 15 | FCI-9679  | 07/31/07  | 07/15/08 | Concrete         |       | Track 10&11            |          |
| 16 | FCI-9700  | 07/31/07  | 07/15/08 | Concrete Asphalt |       | Roll-off pad           |          |
| 17 | FCI-9814  | 07/31/07  | 07/15/08 | Concrete Asphalt |       | Roll-Off Pad           |          |
| 18 | FCI-9819  |           |          | Empty            |       | Roll-Off Pad           |          |
| 19 | FCI-9951  | 07/31/07  | 07/15/08 | Concrete Asphalt |       | Roll-off pad           |          |
| 20 | FCI-9961  | 03/05/07  | 02/18/08 | Wood and Plastic |       | Roll-off pad           |          |

# **Monitoring Wells**

Well

| <br>Number | Location                  | Status (at time of inspection) | Date (tank last emptied) |  |  |
|------------|---------------------------|--------------------------------|--------------------------|--|--|
| MW202      | South Side of Unit-3      | Off                            |                          |  |  |
|            |                           |                                |                          |  |  |
| MW208      | South of Air Stripper     | On                             |                          |  |  |
| MW210      | South of Air Stripper     | On                             |                          |  |  |
| MW212      | South of Air Stripper     | On                             |                          |  |  |
|            |                           | (2) 100 PER 1995 学证            |                          |  |  |
| MW205      | East Side of #2 Tank Farm | On                             |                          |  |  |
| MW218      | West Side of #1 Tank Farm | On                             |                          |  |  |
| MW219      | West Side of #1 Tank Farm | On                             |                          |  |  |

DATE: 03/19/09

TO: Distribution

FROM: Adrienne DeFeiice

SUBJECT: Weekly Hazardous Waste Management Inspection

INSPECTION DATE: March 19, 2009

#### 90 DAY ACCUMULATION TANKS

# Annual Used Oil Sample from Maintenance Tote(s)

|             | Date Last      |                 | Last Taken       | Take by    |
|-------------|----------------|-----------------|------------------|------------|
| <u>Tank</u> | <b>Emptied</b> | <u>Due Date</u> | 12/03/08         | 11/18/2009 |
| VT-245      | 02/25/09       | 05/06/09        |                  |            |
| VT-130      | 03/12/09       | 05/21/09        |                  |            |
| VT-132      | 03/12/09       | 05/21/09        | Annual NPDES In  | spection   |
| VT-602      | 01/31/09       | 04/11/09        | <u>Inspected</u> | Inspect by |
|             |                |                 | 12/10/08         | 11/25/2009 |

#### **BOILER TESTS (BIF)**

|                          | Date Last     |                 | Replace Acid Total | •                               |
|--------------------------|---------------|-----------------|--------------------|---------------------------------|
| <u>Shutdown</u>          | <u>Tested</u> | <u>Due Date</u> | Last chance        | e: Internal Due Date to change: |
| Residue Flow & Leak Test |               |                 | 10/26/20           | 07 10/10/2008                   |
| BL#1                     | Down          | 01/30/00        | (Leak Test)        |                                 |
| BL#2                     | 03/05/09      | 04/04/09        |                    |                                 |

# CO ppmv/Software check BL#1 Down 01/07/00 BL#2 03/17/09 03/24/09

<u>Residue Samples</u> 03/12/09 06/10/09

| Quarterly calibration error test (First Friday of Quarter) |          |          |  |  |  |
|--|----------|----------|--|--|--|
| СО   | 02/26/09 | 05/27/09 |  |  |  |
| NOx  | 02/26/09 | 05/27/09 |  |  |  |
| O2   | 02/26/09 | 05/27/09 |  |  |  |
| Opacity  | 02/26/09 | 05/27/09 |  |  |  |

#### STORAGE TANK HIGH LEVEL ALARM TEST

|             | Date Last     |                 |
|-------------|---------------|-----------------|
| <u>Tank</u> | <u>Tested</u> | <u>Due Date</u> |
| VT-621      | 06/19/08      | 06/09/09        |
| VT-622      | 06/19/08      | 06/09/09        |
| VT-701      | 06/19/08      | 06/09/09        |
|             |               |                 |

#### Replace Carbon Drum on Wastewater Pits

| Replace Carbon Drum on Wastewater Pits |         |        |   |  |  |  |
|--|---------|--------|---|--|--|--|
| Date:                                  | Offline | Online | Due for change<br>(internal limit<br>18 days) |  |  |  |
| Unit 2 Phenol Sump                     |         |        |   |  |  |  |
| FN-200 A                               | 3/5/09  |        |   |  |  |  |
| FN-200 B                               |         | 3/5/09 | 3/23/09                                       |  |  |  |
| Unit 2 Non-phenolic                    |         |        |   |  |  |  |
| FN-201A                                |         | 3/5/09 | 3/23/09                                       |  |  |  |
| FN-201B                                | 3/5/09  |        |   |  |  |  |
| Unit 3 Phenol Sump                     |         |        |   |  |  |  |
| FN-300A                                | 3/5/09  |        |   |  |  |  |
| FN-300B                                |         | 3/5/09 | 3/23/09                                       |  |  |  |
| Uni1 AMS Phenol Sump                   |         |        |   |  |  |  |
| FN-106A                                | 3/5/09  |        |   |  |  |  |
| FN-106B                                |         | 3/5/09 | 3/23/09                                       |  |  |  |

#### STORAGE TANK ANNUAL EMPTY

|             | Date Last      |                 |  |
|-------------|----------------|-----------------|--|
| <u>Tank</u> | <u>Emptied</u> | <u>Due Date</u> | Source:                                  |
| VT-621      | 02/25/09       | 01/26/10        | flow through verififcation demonstration |
| VT-622      | 01/15/09       | 12/16/09        | flow through verififcation demonstration |

| HAZARDOUS & RESIDUAL | WACTE | MANACEMENTICS |  |
|----------------------|-------|---------------|--|
|                      |       |               |  |

Updated during inspection on 3/19/2009

| Department<br>Responsible | Area                                  | Issue  | Action Taken (T) / Required (R)   | Target<br>Due Date | Person(s) contacted to correct problem |  |  |  |  |
|---------------------------|---------------------------------------|--|---|--------------------|--|--|--|--|--|
| New Items Re              | equiring Attention:                   |  |   |                    | -                                      |  |  |  |  |
| Operations                | Unit 3 Tank Farm                      | Tank Farm dikes unlocked and opened near VT-339            | (R) Close and lock valves   | 3/20/2009          |  |  |  |  |  |
| Previous Item             | Previous Items Remaining Open:        |  |   |                    |  |  |  |  |  |
| Boiler House              | VT-701 oil storage tote storeage area | Clean up all debns located in oil tote storage berm        | (R) Clean up / dispose of junk in berm                                  | 3/20/2009          |  |  |  |  |  |
| Operations                | Under 801/501 CAD Units               | Some carbon and various misc debris needs to be cleaned up | (R) Sweep / clean up all carbon from under CAD beds                     | 3/20/2009          |  |  |  |  |  |
| Maintenance               | Lead-acid battery shed                | No labels on batteries                                     | Blank lables ordered by M Sweitzer                                      | 3/20/2009          |  |  |  |  |  |
| Eng / Maint               | #6 fuel oil delivery area             | Temporary containment berm needs maintenance               | Scheduled to be removed   | 3/20/2009          |  |  |  |  |  |
| Operations                | Unit 2 West Tank Accumulation Point   | No plug on containment pallet.                             | (R) New containment dike to be ordered by M Sweitzer                    | 3/20/2009          |  |  |  |  |  |
| Maintenance               | Waste Battery Shed                    | Door off hinges  | (R) Repair door   | 11/15/2008         | WO order submitted                     |  |  |  |  |
| Maintenance               | Waste Oil Tote Storage Area           | Totes mislabeled or labels faded                           | ( R) Develop stencil and label all totes with the words "USED OIL ONLY" | 11/12/2008         | WO submitted 11/7/08                   |  |  |  |  |
| Completed Ite             | ems from Previous Inspection:         |  |   |                    |  |  |  |  |  |
| Operations                | Unit #3 East Tank Accumulation Point  | Broken glass and caps on ground in entire area             | Sweep/clean glass and caps around drum                                  | Completed          |  |  |  |  |  |

## FRANKFORD PLANT HAZARDOUS WASTE INSPECTION FORM PLACE "X" IF AREA IS DEFICIENT (MAKE COMMENTS BELOW)

INSPECTED BY: Adrienne DeFelice DATE: 03/19/09 TIME: 9:00 AM CONTAINER STORAGE INVENTORY
Hazardous 72
Residual 88

CONTAINER REACTIVES IN **LEAKS** DIKE CONDITION CONDITION PROPER ADEQUATE SECTION B? UNSHIPPED PALLETS FROM (CRACKS, HOLES, (BULGING, RUST, CONTAINER LABELING SODA ASH ALL OTHERS IN DRUMS IN ANY SPILLS IN POOR **TANKS** LEAK, ETC.) COVERED (DATE, ID, ETC.) SUPPLY SECTION A? WAREHOUSE OF MATERIAL CONDITION ETC.) UNIT NO. 2: CHP FILTER AREAS OK ОК N/A EAST PROCESS ACCUMULATION POINTS OK ОК N/A N/A N/A WEST TANK ACCUMULATION POINTS OK ок loĸ N/A N/A N/A CL-220 STRAINERS OK N/A lok Оĸ N/A FEROME DRUM OK ОК OK ОК N/A N/A N/A VT-245 Tank OOS N/A lок N/A N/A lок UNIT 2 TANK FARM OK OΚ ок ок N/A N/A N/A TANK FARM DIKE VALVES OK N/A OK loĸ N/A N/A UNIT NO. 3: CHP FILTER AREAS OK ОК N/A N/A ОK oκ EAST TANK ACCUMULATION POINTS OK N/A N/A N/A UNIT 3 TANK FARM OK
TANK FARM DIKE VALVES See Page 2 lok N/A N/A N/A oκ ок οĸ ок N/A N/A N/A ОК UNIT 3 PHENOL SLUDGE DRUM OK οк οκ lok N/A N/A N/A BOILERHOUSE: BOILERHOUSE OK N/A oĸ LAB WASTE DRUMS Inaccessible due to constru ok N/A ок VT-701 OIL TOTES CONTAINMENT VALVE See Page 2 N/A N/A N/A OTHER PLANT AREAS: PR-2 OK PR-2 TANK FARM OK N/A N/A oκ lок N/A MAINTENANCE SHOP OK οĸ lοκ AEROSOL DRUM IN MAINTENACE SHOP OK N/A ок lок N/A MAINTENANCE YARD OK ок ок N/A N/A N/A No lok. VT-602 1'0" N/A N/A N/A ОК ОК ОК VT-130 2' 1" οк ОК N/A N/A N/A lок VT-132 5' 11" ок ОК N/A N/A N/A oĸ STOREROOM OK loĸ lok lok lok N/A N/A N/A No OK SODIUM HYDROXIDE FILTER DRUM (OUTSIDE STORES) Empty drum; no label N/A oκ οк lок ОК ОК GARAGE(Firehouse) OK N/A N/A N/A OK loĸ lok ACETONE FILTERS @ HIGH PURITY TANK FARM OK ок ок ок N/A N/A N/A ок UNIT 1 TANK FARM OK N/A N/A Оĸ ОК lok OK N/A TANK FARM DIKE VALVES OK ок ок ОК ок N/A N/A N/A OK OX-801 See page 2 N/A N/A οк OK OX-501 See page 2 lok οκ οк lok N/A N/A N/A OK OX-401 OK N/A N/A N/A ОK ОК LEAD ACID BATTERY SHED See page 2 οк loĸ N/A ок N/A N/A NA DRUM PAD OK QC LAB SATELLITE STORAGE EAST OK N/A οк OΚ N/A N/A N/A N/A QC LAB SATELLITE STORAGE WEST OK CONTAINER STORAGE AREA: STILES STREET N/A CATOX SUBSTATION / BULBS OK N/A N/A ОК **RESIDUE STORAGE TANKS:** VT-621 Tank OOS for cleaning VT-622 16' 7" N/A N/A LOADING AREA/ACCUMULATION POINT: WAREHOUSE #9 OK lок OK loκ OK N/A VAC TRUCK DECON PAD OK UNLOADING AREA: N/A lοκ oκ N/A No lok OK N/A TRACKS 10&11 SOUTH OK oĸ

REMARKS: IF EITHER SUMP A OR SUMP B IS GREATER THAN TWO FEET, THE SUMP WILL BE EMPTIED.

# **Monitoring Wells**

#### Well

| Number | Location                  | Status (at time of inspection) | Date (tank last emptied) |
|--------|---------------------------|--------------------------------|--------------------------|
|        | A CONTRACT OF STREET      |                                |                          |
| MW205  | East Side of #2 Tank Farm | On                             |                          |
| MW218  | West Side of #1 Tank Farm | On                             |                          |
| MW219  | West Side of #1 Tank Farm | On                             |                          |

#### **Plant Dumpsters**

## Updated during inspection on 3/19/2009

|    | Dumpster  | Date      | Remove   |                          | Owner                   |                              |          |
|----|-----------|-----------|----------|--------------------------|-------------------------|------------------------------|----------|
| #  | Number    | Generated | Ву       | Contents                 | (Per Log Book) Location |                              | Comments |
| 1  | C40712    |           |          | Asbestos                 |                         | Behind Trash Compactor       |          |
| 2  | FCI-01140 |           |          | Kiln Dust                |                         | Behind Dispensary            |          |
| 3  | FCI-0220  | 11/13/08  | 11/08/09 | Concrete and Asphalt     | H. Collins              | Roll-Off Pad                 |          |
| 4  | FCI-0522  | 11/12/08  | 01/21/09 | Haz Soil                 | T. O'Dea                | Roll-off Pad                 |          |
| 5  | FCI-8923  | 01/06/09  | 01/01/10 | Plant Trash/Debris       | C. Pitt                 | Behind Admin Bldg            |          |
| 6  | FCI-0458  | 12/17/08  | 12/12/09 | Non Haz wood and plastic | C. Pitt                 | Behind Dispensary            |          |
| 7  | FCI-0504  |           |          | Empty                    |                         | Cooling Tower 3              |          |
| 8  | FCI-9801  | 01/26/09  | 04/06/09 | Hazardous Soil           | R. Labonte              | Roll-Off Pad                 |          |
| 9  | FCI-9438  | 02/11/09  | 02/06/10 | Concrete                 |                         | Warehouse #9                 |          |
| 10 | FCI-0823  | No label  |          | Wood/Plastic             |                         | W. Side Maintenace           |          |
| 11 | FCI-0222  |           |          | Empty                    |                         | Roll-Off Pad                 |          |
| 12 | FCI-9867  | 03/17/09  | 05/26/09 | Hazardous Soil           | C. Pitt                 | Wakeling St. Near Ben and Be | ertha    |

Acetophenone Flow Through

Assumed Size of Tank

514,934.55 lbs (FI5706 + FI5726) gph

Flow rate

One molecule of AP weighs 1.997x10-22lbs AP density = 1.028 g/cm<sup>3</sup> 8.582242 lb/gal

|           | Day | AP in tank   | Dilute<br>in tank | Residue<br>Flow to Blr | Residue<br>Flow | Dilute out | AP out     | AP Conc.<br>in tank | AP in<br>tank ppm |
|-----------|-----|--------------|-------------------|------------------------|-----------------|------------|------------|---------------------|-------------------|
|           |     | lbs          | lbs               | gph                    | lbs/day         | lbs        | lbs        | III tallik          | tunk ppin         |
| 1/1/2010  | 0   | 514,934.5455 | 0.00              | 891.404541             | 183,606.00      | 0.00       | 183,606.00 | 100.0000%           | 1,000,000         |
| 1/2/2010  | 1   | 331,328.55   | 183,606.00        | 866.513184             | 178,479.03      | 63,638.81  | 114,840.22 | 64.3438%            | 643,438.18        |
| 1/3/2010  | 2   | 216,488.33   | 298,446.22        | 863.854004             | 177,931.31      | 103,125.58 | 74,805.72  | 42.0419%            | 420,419.12        |
| 1/4/2010  | 3   | 141,682.60   | 373,251.94        | 826.912598             | 170,322.35      | 123,458.69 | 46,863.65  | 27.5147%            | 275,146.82        |
| 1/5/2010  | 4   | 94,818.95    | 420,115.59        | 561.09375              | 115,570.62      | 94,289.69  | 21,280.93  | 18.4138%            | 184,137.87        |
| 1/6/2010  | 5   | 73,538.02    | 441,396.52        | 550.568115             | 113,402.62      | 97,207.54  | 16,195.08  | 14.2810%            | 142,810.43        |
| 1/7/2010  | 6   | 57,342.95    | 457,591.60        | 303.696777             | 62,553.58       | 55,587.64  | 6,965.95   | 11.1360%            | 111,359.68        |
| 1/8/2010  | 7   | 50,377.00    | 464,557.55        | 623.649414             | 128,455.45      | 115,888.42 | 12,567.03  | 9.7832%             | 97,831.85         |
| 1/9/2010  | 8   | 37,809.97    | 477,124.58        | 791.984375             | 163,128.05      | 151,150.09 | 11,977.96  | 7.3427%             | 73,426.74         |
| 1/10/2010 | 9   | 25,832.00    | 489,102.54        | 789.038086             | 162,521.19      | 154,368.21 | 8,152.97   | 5.0166%             | 50,165.61         |
| 1/11/2010 | 10  | 17,679.03    | 497,255.52        | 759.130859             | 156,361.08      | 150,992.80 | 5,368.28   | 3.4333%             | 34,332.58         |
| 1/12/2010 | 11  | 12,310.75    | 502,623.79        | 676.884277             | 139,420.44      | 136,087.26 | 3,333.18   | 2.3907%             | 23,907.41         |
| 1/13/2010 | 12  | 8,977.57     | 505,956.98        | 692.10791              | 142,556.11      | 140,070.73 | 2,485.38   | 1.7434%             | 17,434.39         |
| 1/14/2010 | 13  | 6,492.19     | 508,442.35        | 691.044922             | 142,337.16      | 140,542.60 | 1,794.56   | 1.2608%             | 12,607.80         |
| 1/15/2010 | 14  | 4,697.63     | 510,236.91        | 579.554199             | 119,372.99      | 118,283.98 | 1,089.01   | 0.9123%             | 9,122.78          |
| 1/16/2010 | 15  | 3,608.62     | 511,325.93        | 654.012939             | 134,709.54      | 133,765.51 | 944.03     | 0.7008%             | 7,007.92          |
| 1/17/2010 | 16  | 2,664.59     | 512,269.96        | 655.607422             | 135,037.96      | 134,339.19 | 698.77     | 0.5175%             | 5,174.61          |
| 1/18/2010 | 17  | 1,965.82     | 512,968.73        | 651.734863             | 134,240.32      | 133,727.84 | 512.48     | 0.3818%             | 3,817.61          |
| 1/19/2010 | 18  | 1,453.34     | 513,481.20        | 679.758789             | 140,012.51      | 139,617.34 | 395.17     | 0.2822%             | 2,822.38          |
| 1/20/2010 | 19  | 1,058.17     | 513,876.37        | 661.477783             | 136,247.10      | 135,967.12 | 279.98     | 0.2055%             | 2,054.96          |
| 1/21/2010 | 20  | 778.19       | 514,156.36        | 903.611816             | 186,120.38      | 185,839.10 | 281.27     | 0.1511%             | 1,511.24          |
| 1/22/2010 | 21  | 496.92       | 514,437.63        | 1045.88647             | 215,425.23      | 215,217.34 | 207.89     | 0.0965%             | 965.01            |
| 1/23/2010 | 22  | 289.03       | 514,645.52        | 1050.92456             | 216,462.94      | 216,341.45 | 121.50     | 0.0561%             | 561.29            |
| 1/24/2010 | 23  | 167.53       | 514,767.02        | 1086.50903             | 223,792.41      | 223,719.60 | 72.81      | 0.0325%             | 325.34            |
| 1/25/2010 | 24  | 94.72        | 514,839.82        | 1063.73682             | 219,101.93      | 219,061.63 | 40.30      | 0.0184%             | 183.9475          |
| 1/26/2010 | 25  | 54.42        | 514,880.13        | 1051.04761             | 216,488.29      | 216,465.41 | 22.88      | 0.0106%             | 105.6788          |

|           | Day | AP in tank | Dilute<br>in tank | Residue<br>Flow to Blr | Residue<br>Flow | Dilute out | AP out | AP Conc.<br>in tank | AP in<br>tank ppm |
|-----------|-----|------------|-------------------|------------------------|-----------------|------------|--------|---------------------|-------------------|
| 1/07/0010 | 26  | lbs        | lbs               | <b>gph</b>             | lbs/day         | lbs        | lbs    | 0.00040/            | 0.4.0.4.0.4       |
| 1/27/2010 | 26  | 31.54      | 514,903.01        | 1069.03125             | 220,192.45      | 220,178.96 | 13.49  | 0.0061%             | 61.2494           |
| 1/28/2010 | 27  | 18.05      |                   | 907.985107             | 187,021.16      | 187,014.60 | 6.56   | 0.0035%             | 35.0584           |
| 1/29/2010 | 28  | 11.50      | •                 | 908.472168             | 187,121.48      | 187,117.30 | 4.18   | 0.0022%             | 22.3254           |
| 1/30/2010 | 29  | 7.32       | •                 | 881.193359             | 181,502.76      | 181,500.18 | 2.58   | 0.0014%             | 14.2126           |
| 1/31/2010 | 30  | 4.74       |                   | 865.306641             | 178,230.51      | 178,228.87 | 1.64   | 0.0009%             | 9.2030            |
| 2/1/2010  | 31  | 3.10       | •                 | 869.126221             | 179,017.25      | 179,016.17 | 1.08   | 0.0006%             | 6.0176            |
| 2/2/2010  | 32  | 2.02       | •                 | 878.906738             | 181,031.78      | 181,031.07 | 0.71   | 0.0004%             | 3.9256            |
| 2/3/2010  | 33  | 1.31       |                   | 883.693604             | 182,017.75      | 182,017.28 | 0.46   | 0.0003%             | 2.5455            |
| 2/4/2010  | 34  | 0.85       | •                 | 964.637939             | 198,690.16      | 198,689.83 | 0.33   | 0.0002%             | 1.6457            |
| 2/5/2010  | 35  | 0.52       | •                 | 941.710205             | 193,967.65      | 193,967.45 | 0.20   | 0.0001%             | 1.0107            |
| 2/6/2010  | 36  | 0.32       | •                 | 856.252441             | 176,365.58      | 176,365.47 | 0.11   | 0.0001%             | 0.6300            |
| 2/7/2010  | 37  | 0.21       | ,                 | 856.252441             | 176,365.58      | 176,365.51 | 0.07   | 0.0000%             | 0.4142            |
| 2/8/2010  | 38  | 0.14       | 514,934.41        | 874.420654             | 180,107.76      | 180,107.71 | 0.05   | 0.0000%             | 0.2723            |
| 2/9/2010  | 39  | 0.09       | 514,934.45        | 905.049072             | 186,416.41      | 186,416.38 | 0.03   | 0.0000%             | 0.1771            |
| 2/10/2010 | 40  | 0.06       | ,                 | 873.745605             | 179,968.72      | 179,968.70 | 0.02   | 0.0000%             | 0.1130            |
| 2/11/2010 | 41  | 0.04       | 514,934.51        | 802.615967             | 165,317.88      | 165,317.86 | 0.01   | 0.0000%             | 0.0735            |
| 2/12/2010 | 42  | 0.03       | 514,934.52        | 881.398438             | 181,545.00      | 181,544.99 | 0.01   | 0.0000%             | 0.0499            |
| 2/13/2010 | 43  | 0.02       | 514,934.53        | 822.626465             | 169,439.51      | 169,439.51 | 0.01   | 0.0000%             | 0.0323            |
| 2/14/2010 | 44  | 0.01       | 514,934.53        | 812.933105             | 167,442.94      | 167,442.93 | 0.00   | 0.0000%             | 0.0217            |
| 2/15/2010 | 45  | 0.01       | 514,934.54        | 695.992432             | 143,356.22      | 143,356.22 | 0.00   | 0.0000%             | 0.0146            |
| 2/16/2010 | 46  | 0.01       | 514,934.54        | 634.783447             | 130,748.77      | 130,748.77 | 0.00   | 0.0000%             | 0.0106            |
| 2/17/2010 | 47  | 0.00       | 514,934.54        | 752.737549             | 155,044.23      | 155,044.23 | 0.00   | 0.0000%             | 0.0079            |
| 2/18/2010 | 48  | 0.00       | 514,934.54        | 829.756348             | 170,908.08      | 170,908.08 | 0.00   | 0.0000%             | 0.0055            |
| 2/19/2010 | 49  | 0.00       | 514,934.54        | 862.799561             | 177,714.12      | 177,714.12 | 0.00   | 0.0000%             | 0.0037            |
| 2/20/2010 | 50  | 0.00       | 514,934.54        | 890.41333              | 183,401.83      | 183,401.83 | 0.00   | 0.0000%             | 0.0024            |
| 2/21/2010 | 51  | 0.00       | 514,934.54        | 878.28125              | 180,902.94      | 180,902.94 | 0.00   | 0.0000%             | 0.0016            |
| 2/22/2010 | 52  | 0.00       | 514,934.54        | 878.568359             | 180,962.08      | 180,962.08 | 0.00   | 0.0000%             | 0.0010            |
| 2/23/2010 | 53  | 0.00       | 514,934.55        | 738.923828             | 152,198.96      | 152,198.96 | 0.00   | 0.0000%             | 0.0007            |
| 2/24/2010 | 54  | 0.00       | 514,934.55        | 714.18457              | 147,103.32      | 147,103.32 | 0.00   | 0.0000%             | 0.0005            |
| 2/25/2010 | 55  | 0.00       | 514,934.55        | 356.793213             | 73,490.06       | 73,490.06  | 0.00   | 0.0000%             | 0.0003            |
| 2/26/2010 | 56  | 0.00       | 514,934.55        | 922.928467             | 190,099.10      | 190,099.10 | 0.00   | 0.0000%             | 0.0003            |
| 2/27/2010 | 57  | 0.00       | 514,934.55        | 861.620361             | 177,471.24      | 177,471.24 | 0.00   | 0.0000%             | 0.0002            |
| 2/28/2010 | 58  | 0.00       | 514,934.55        | 839.162598             | 172,845.52      | 172,845.52 | 0.00   | 0.0000%             | 0.0001            |
| 3/1/2010  | 59  | 0.00       | 514,934.55        | 833.859619             | 171,753.25      | 171,753.25 | 0.00   | 0.0000%             | 7.72823E-05       |

|           | Day | AP in tank | Dilute<br>in tank | Residue<br>Flow to Blr | Residue<br>Flow | Dilute out | AP out | AP Conc.<br>in tank | AP in<br>tank ppm |
|-----------|-----|------------|-------------------|------------------------|-----------------|------------|--------|---------------------|-------------------|
|           |     | lbs        | lbs               | gph                    | lbs/day         | lbs        | lbs    |                     |                   |
| 3/2/2010  | 60  | 0.00       | 514,934.55        |                        | 178,971.49      | 178,971.49 | 0.00   | 0.0000%             | 5.15052E-05       |
| 3/3/2010  | 61  | 0.00       | 514,934.55        |                        | 178,161.87      | 178,161.87 | 0.00   | 0.0000%             | 3.3604E-05        |
| 3/4/2010  | 62  | 0.00       | 514,934.55        |                        | 178,221.01      | 178,221.01 | 0.00   | 0.0000%             | 2.19774E-05       |
| 3/5/2010  | 63  | 0.00       | 514,934.55        |                        | 177,343.81      | 177,343.81 | 0.00   | 0.0000%             | 1.43709E-05       |
| 3/6/2010  | 64  | 0.00       | 514,934.55        | 756.687012             | 155,857.71      | 155,857.71 | 0.00   | 0.0000%             | 9.42156E-06       |
| 3/7/2010  | 65  | 0.00       | '                 |                        | 156,050.26      | 156,050.26 | 0.00   | 0.0000%             | 6.56989E-06       |
| 3/8/2010  | 66  | 0.00       | 514,934.55        | 789.6875               | 162,654.95      | 162,654.95 | 0.00   | 0.0000%             | 4.57889E-06       |
| 3/9/2010  | 67  | 0.00       | 514,934.55        | 767.364746             | 158,057.05      | 158,057.05 | 0.00   | 0.0000%             | 3.13254E-06       |
| 3/10/2010 | 68  | 0.00       | 514,934.55        |                        | 156,541.66      | 156,541.66 | 0.00   | 0.0000%             | 2.17102E-06       |
| 3/11/2010 | 69  | 0.00       | •                 |                        | 163,385.01      | 163,385.01 | 0.00   | 0.0000%             | 1.51102E-06       |
| 3/12/2010 | 70  | 0.00       | •                 | 762.500977             | 157,055.24      | 157,055.24 | 0.00   | 0.0000%             | 1.03159E-06       |
| 3/13/2010 | 71  | 0.00       |                   | 892.038757             | 183,736.63      | 183,736.63 | 0.00   | 0.0000%             | 7.16951E-07       |
| 3/14/2010 | 72  | 0.00       | 514,934.55        | 936.802063             | 192,956.70      | 192,956.70 | 0.00   | 0.0000%             | 4.61132E-07       |
| 3/15/2010 | 73  | 0.00       | •                 | 934.164978             | 192,413.53      | 192,413.53 | 0.00   | 0.0000%             | 2.88336E-07       |
| 3/16/2010 | 74  | 0.00       | 514,934.55        | 936.30658              | 192,854.64      | 192,854.64 | 0.00   | 0.0000%             | 1.80595E-07       |
| 3/17/2010 | 75  | 0.00       | 514,934.55        | 955.951172             | 196,900.91      | 196,900.91 | 0.00   | 0.0000%             | 1.12958E-07       |
| 3/18/2010 | 76  | 0.00       | 514,934.55        | 963.586304             | 198,473.55      | 198,473.55 | 0.00   | 0.0000%             | 6.9765E-08        |
| 3/19/2010 | 77  | 0.00       | 514,934.55        | 1109.15051             | 228,455.97      | 228,455.97 | 0.00   | 0.0000%             | 4.28752E-08       |
| 3/20/2010 | 78  | 0.00       | 514,934.55        | 1069.49878             | 220,288.75      | 220,288.75 | 0.00   | 0.0000%             | 2.38532E-08       |
| 3/21/2010 | 79  | 0.00       | 514,934.55        | 1045.37903             | 215,320.71      | 215,320.71 | 0.00   | 0.0000%             | 1.36488E-08       |
| 3/22/2010 | 80  | 0.00       | 514,934.55        | 1046.51306             | 215,554.29      | 215,554.29 | 0.00   | 0.0000%             | 7.94153E-09       |
| 3/23/2010 | 81  | 0.00       | 514,934.55        | 1048.58167             | 215,980.37      | 215,980.37 | 0.00   | 0.0000%             | 4.61716E-09       |
| 3/24/2010 | 82  | 0.00       | 514,934.55        | 806.642822             | 166,147.30      | 166,147.30 | 0.00   | 0.0000%             | 2.68057E-09       |
| 3/25/2010 | 83  | 0.00       | 514,934.55        | 862.306824             | 177,612.63      | 177,612.63 | 0.00   | 0.0000%             | 1.81567E-09       |
| 3/26/2010 | 84  | 0.00       | 514,934.55        | 919.007874             | 189,291.56      | 189,291.56 | 0.00   | 0.0000%             | 1.1894E-09        |
| 3/27/2010 | 85  | 0.00       | 514,934.55        | 929.628418             | 191,479.11      | 191,479.11 | 0.00   | 0.0000%             | 7.52174E-10       |
| 3/28/2010 | 86  | 0.00       | 514,934.55        | 934.453796             | 192,473.02      | 192,473.02 | 0.00   | 0.0000%             | 4.72477E-10       |
| 3/29/2010 | 87  | 0.00       | 514,934.55        | 1059.45471             | 218,219.93      | 218,219.93 | 0.00   | 0.0000%             | 2.95874E-10       |
| 3/30/2010 | 88  | 0.00       | 514,934.55        | 1067.55066             | 219,887.49      | 219,887.49 | 0.00   | 0.0000%             | 1.70488E-10       |
| 3/31/2010 | 89  | 0.00       | 514,934.55        | 1066.97998             | 219,769.94      | 219,769.94 | 0.00   | 0.0000%             | 9.76862E-11       |
| 4/1/2010  | 90  | 0.00       | 514,934.55        | 979.609741             | 201,773.96      | 201,773.96 | 0.00   | 0.0000%             | 5.59945E-11       |
| 4/2/2010  | 91  | 0.00       | 514,934.55        | 980.140869             | 201,883.36      | 201,883.36 | 0.00   | 0.0000%             | 3.40534E-11       |
| 4/3/2010  | 92  | 0.00       | 514,934.55        | 935.982605             | 192,787.91      | 192,787.91 | 0.00   | 0.0000%             | 2.07025E-11       |
| 4/4/2010  | 93  | 0.00       | 514,934.55        | 917.493225             | 188,979.58      | 188,979.58 | 0.00   | 0.0000%             | 1.29517E-11       |

.

. .

|           | Day | AP in tank | Dilute<br>in tank | Residue<br>Flow to Blr | Residue<br>Flow | Dilute out | AP out | AP Conc.<br>in tank | AP in<br>tank ppm |
|-----------|-----|------------|-------------------|------------------------|-----------------|------------|--------|---------------------|-------------------|
|           |     | lbs        | lbs               | gph                    | lbs/day         | lbs        | lbs    | III LAIIK           | тапк ррш          |
| 4/5/2010  | 94  | 0.00       | 514,934.55        | 901.463135             | 185,677.80      | 185,677.80 | 0.00   | 0.0000%             | 8.19843E-12       |
| 4/6/2010  | 95  | 0.00       | 514,934.55        | 871.95282              | 179,599.45      | 179,599.45 | 0.00   | 0.0000%             | 5.2422E-12        |
| 4/7/2010  | 96  | 0.00       | 514,934.55        | 808.97699              | 166,628.08      | 166,628.08 | 0.00   | 0.0000%             | 3.41382E-12       |
| 4/8/2010  | 97  | 0.00       | 514,934.55        | 694.406311             | 143,029.52      | 143,029.52 | 0.00   | 0.0000%             | 2.30914E-12       |
| 4/9/2010  | 98  | 0.00       | 514,934.55        | 932.405457             | 192,051.11      | 192,051.11 | 0.00   | 0.0000%             | 1.66775E-12       |
| 4/10/2010 | 99  | 0.00       | 514,934.55        | 941.021362             | 193,825.76      | 193,825.76 | 0.00   | 0.0000%             | 1.04574E-12       |
| 4/11/2010 | 100 | 0.00       | 514,934.55        | 1061.8606              | 218,715.48      | 218,715.48 | 0.00   | 0.0000%             | 6.52115E-13       |
| 4/12/2010 | 101 | 0.00       | 514,934.55        | 1031.35181             | 212,431.47      | 212,431.47 | 0.00   | 0.0000%             | 3.75133E-13       |
| 4/13/2010 | 102 | 0.00       | 514,934.55        | 915.651733             | 188,600.28      | 188,600.28 | 0.00   | 0.0000%             | 2.20375E-13       |
| 4/14/2010 | 103 | 0.00       | 514,934.55        | 877.502197             | 180,742.48      | 180,742.48 | 0.00   | 0.0000%             | 1.3966E-13        |
| 4/15/2010 | 104 | 0.00       | 514,934.55        | 867.946533             | 178,774.26      | 178,774.26 | 0.00   | 0.0000%             | 9.06395E-14       |
| 4/16/2010 | 105 | 0.00       | 514,934.55        | 734.832581             | 151,356.27      | 151,356.27 | 0.00   | 0.0000%             | 5.91714E-14       |
| 4/17/2010 | 106 | 0.00       | 514,934.55        | 942.515564             | 194,133.53      | 194,133.53 | 0.00   | 0.0000%             | 4.1779E-14        |
| 4/18/2010 | 107 | 0.00       | 514,934.55        | 775.781189             | 159,790.61      | 159,790.61 | 0.00   | 0.0000%             | 2.6028E-14        |
| 4/19/2010 | 108 | 0.00       | 514,934.55        | 770.008972             | 158,601.69      | 158,601.69 | 0.00   | 0.0000%             | 1.79512E-14       |
| 4/20/2010 | 109 | 0.00       | 514,934.55        | 829.323669             | 170,818.96      | 170,818.96 | 0.00   | 0.0000%             | 1.24222E-14       |
| 4/21/2010 | 110 | 0.00       | 514,934.55        | 827.742126             | 170,493.21      | 170,493.21 | 0.00   | 0.0000%             | 8.30137E-15       |
| 4/22/2010 | 111 | 0.00       | 514,934.55        | 820.533508             | 169,008.42      | 169,008.42 | 0.00   | 0.0000%             | 5.55281E-15       |
| 4/23/2010 | 112 | 0.00       | 514,934.55        | 825.228333             | 169,975.43      | 169,975.43 | 0.00   | 0.0000%             | 3.73031E-15       |
| 4/24/2010 | 113 | 0.00       | 514,934.55        | 821.366821             | 169,180.06      | 169,180.06 | 0.00   | 0.0000%             | 2.49896E-15       |
| 4/25/2010 | 114 | 0.00       | 514,934.55        | 776.54657              | 159,948.26      | 159,948.26 | 0.00   | 0.0000%             | 1.67794E-15       |
| 4/26/2010 | 115 | 0.00       | 514,934.55        | 496.936768             | 102,355.96      | 102,355.96 | 0.00   | 0.0000%             | 1.15674E-15       |
| 4/27/2010 | 116 | 0.00       | 514,934.55        | 452.009277             | 93,102.08       | 93,102.08  | 0.00   | 0.0000%             | 9.26809E-16       |
| 4/28/2010 | 117 | 0.00       | ·                 | 503.603516             | 103,729.14      | 103,729.14 | 0.00   | 0.0000%             | 7.59238E-16       |
| 4/29/2010 | 118 | 0.00       | 514,934.55        | 704.204102             | 145,047.61      | 145,047.61 | 0.00   | 0.0000%             | 6.06296E-16       |
| 4/30/2010 | 119 | 0.00       | 514,934.55        | 818.538574             | 168,597.52      | 168,597.52 | 0.00   | 0.0000%             | 4.35514E-16       |
| 5/1/2010  | 120 | 0.00       | 514,934.55        | 792.257813             | 163,184.37      | 163,184.37 | 0.00   | 0.0000%             | 2.9292E-16        |
| 5/2/2010  | 121 | 0.00       | 514,934.55        | 824.075684             | 169,738.02      | 169,738.02 | 0.00   | 0.0000%             | 2.00093E-16       |
| 5/3/2010  | 122 | 0.00       | 514,934.55        | 785.491943             | 161,790.77      | 161,790.77 | 0.00   | 0.0000%             | 1.34136E-16       |
| 5/4/2010  | 123 | 0.00       | 514,934.55        | 739.057129             | 152,226.42      | 152,226.42 | 0.00   | 0.0000%             | 9.19909E-17       |
| 5/5/2010  | 124 | 0.00       | ·                 | 892.269287             | 183,784.11      | 183,784.11 | 0.00   | 0.0000%             | 6.47963E-17       |
| 5/6/2010  | 125 | 0.00       | •                 | 796.453369             | 164,048.54      | 164,048.54 | 0.00   | 0.0000%             | 4.167E-17         |
| 5/7/2010  | 126 | 0.00       | •                 | 916.805176             | 188,837.86      | 188,837.86 | 0.00   | 0.0000%             | 2.83947E-17       |
| 5/8/2010  | 127 | 0.00       | 514,934.55        | 942.723633             | 194,176.39      | 194,176.39 | 0.00   | 0.0000%             | 1.79817E-17       |

|           | Day | AP in tank | Dilute<br>in tank | Residue<br>Flow to Blr | Residue<br>Flow | Dilute out | AP out | AP Conc.<br>in tank | AP in<br>tank ppm |
|-----------|-----|------------|-------------------|------------------------|-----------------|------------|--------|---------------------|-------------------|
|           |     | lbs        | lbs               | gph                    | lbs/day         | lbs        | lbs    | III tulik           | tank ppm          |
| 5/9/2010  | 128 | 0.00       | 514,934.55        | 370.825684             | 76,380.38       | 76,380.38  | 0.00   | 0.0000%             | 1.1201E-17        |
| 5/10/2010 | 129 | 0.00       | 514,934.55        | 931.957031             | 191,958.75      | 191,958.75 | 0.00   | 0.0000%             | 9.53957E-18       |
| 5/11/2010 | 130 | 0.00       | 514,934.55        | 739.417725             | 152,300.69      | 152,300.69 | 0.00   | 0.0000%             | 5.98338E-18       |
| 5/12/2010 | 131 | 0.00       | 514,934.55        | 825.207031             | 169,971.04      | 169,971.04 | 0.00   | 0.0000%             | 4.21369E-18       |
| 5/13/2010 | 132 | 0.00       | 514,934.55        | 861.610107             | 177,469.12      | 177,469.12 | 0.00   | 0.0000%             | 2.82283E-18       |
| 5/14/2010 | 133 | 0.00       | 514,934.55        | 841.779053             | 173,384.45      | 173,384.45 | 0.00   | 0.0000%             | 1.84996E-18       |
| 5/15/2010 | 134 | 0.00       | 514,934.55        | 784.283691             | 161,541.91      | 161,541.91 | 0.00   | 0.0000%             | 1.22705E-18       |
| 5/16/2010 | 135 | 0.00       | 514,934.55        | 584.000977             | 120,288.91      | 120,288.91 | 0.00   | 0.0000%             | 8.42111E-19       |
| 5/17/2010 | 136 | 0.00       | 514,934.55        | 580.502686             | 119,568.35      | 119,568.35 | 0.00   | 0.0000%             | 6.45393E-19       |
| 5/18/2010 | 137 | 0.00       | 514,934.55        | 663.343994             | 136,631.50      | 136,631.50 | 0.00   | 0.0000%             | 4.95532E-19       |
| 5/19/2010 | 138 | 0.00       | 514,934.55        | 1014.15063             | 208,888.48      | 208,888.48 | 0.00   | 0.0000%             | 3.64049E-19       |
| 5/20/2010 | 139 | 0.00       | 514,934.55        | 1340.45213             | 276,098.04      | 276,098.04 | 0.00   | 0.0000%             | 2.16369E-19       |
| 5/21/2010 | 140 | 0.00       | 514,934.55        | 1401.67487             | 288,708.32      | 288,708.32 | 0.00   | 0.0000%             | 1.00356E-19       |
| 5/22/2010 | 141 | 0.00       | 514,934.55        | 1467.6763              | 302,302.89      | 302,302.89 | 0.00   | 0.0000%             | 4.40894E-20       |
| 5/23/2010 | 142 | 0.00       | 514,934.55        | 1258.48251             | 259,214.45      | 259,214.45 | 0.00   | 0.0000%             | 1.82058E-20       |
| 5/24/2010 | 143 | 0.00       | 514,934.55        | 1188.16809             | 244,731.52      | 244,731.52 | 0.00   | 0.0000%             | 9.04113E-21       |
| 5/25/2010 | 144 | 0.00       | 514,934.55        | 873.18689              | 179,853.64      | 179,853.64 | 0.00   | 0.0000%             | 4.74418E-21       |
| 5/26/2010 | 145 | 0.00       | 514,934.55        | 1360.88278             | 280,306.22      | 280,306.22 | 0.00   | 0.0000%             | 3.08716E-21       |
| 5/27/2010 | 146 | 0.00       | 514,934.55        | 1165.01651             | 239,962.90      | 239,962.90 | 0.00   | 0.0000%             | 1.40665E-21       |
| 5/28/2010 | 147 | 0.00       | 514,934.55        | 1066.98926             | 219,771.85      | 219,771.85 | 0.00   | 0.0000%             | 7.51144E-22       |
| 5/29/2010 | 148 | 0.00       | 514,934.55        | 866.201782             | 178,414.89      | 178,414.89 | 0.00   | 0.0000%             | 4.30559E-22       |
| 5/30/2010 | 149 | 0.00       | 514,934.55        | 650.716064             | 134,030.47      | 134,030.47 | 0.00   | 0.0000%             | 2.81378E-22       |
| 5/31/2010 | 150 | 0.00       | 514,934.55        | 611.278381             | 125,907.34      | 125,907.34 | 0.00   | 0.0000%             | 2.08139E-22       |
| 6/1/2010  | 151 | 0.00       | 514,934.55        | 613.630981             | 126,391.92      | 126,391.92 | 0.00   | 0.0000%             | 1.57247E-22       |
| 6/2/2010  | 152 | 0.00       | 514,934.55        | 646.442383             | 133,150.21      | 133,150.21 | 0.00   | 0.0000%             | 1.1865E-22        |
| 6/3/2010  | 153 | 0.00       | 514,934.55        | 852.078918             | 175,505.95      | 175,505.95 | 0.00   | 0.0000%             | 8.79701E-23       |
| 6/4/2010  | 154 | 0.00       | 514,934.55        | 840.547546             | 173,130.79      | 173,130.79 | 0.00   | 0.0000%             | 5.79871E-23       |
| 6/5/2010  | 155 | 0.00       | 514,934.55        | 823.858032             | 169,693.18      | 169,693.18 | 0.00   | 0.0000%             | 3.84907E-23       |
| 6/6/2010  | 156 | 0.00       | 514,934.55        | 1037.26318             | 213,649.06      | 213,649.06 | 0.00   | 0.0000%             | 2.58064E-23       |
| 6/7/2010  | 157 | 0.00       | 514,934.55        | 1065.65698             | 219,497.44      | 219,497.44 | 0.00   | 0.0000%             | 1.50992E-23       |
| 6/8/2010  | 158 | 0.00       | 514,934.55        | 1061.1969              | 218,578.78      | 218,578.78 | 0.00   | 0.0000%             | 8.66296E-24       |
| 6/9/2010  | 159 | 0.00       | 514,934.55        | 1054.32654             | 217,163.66      | 217,163.66 | 0.00   | 0.0000%             | 4.98572E-24       |
| 6/10/2010 | 160 | 0.00       | 514,934.55        | 932.324951             | 192,034.53      | 192,034.53 | 0.00   | 0.0000%             | 2.88309E-24       |
| 6/11/2010 | 161 | 0.00       | 514,934.55        | 1138.36584             | 234,473.56      | 234,473.56 | 0.00   | 0.0000%             | 1.8079E-24        |

•

|           | Day | AP in tank | Dilute<br>in tank | Residue<br>Flow to Blr | Residue<br>Flow | Dilute out | AP out | AP Conc.<br>in tank | AP in<br>tank ppm |
|-----------|-----|------------|-------------------|------------------------|-----------------|------------|--------|---------------------|-------------------|
|           |     | lbs        | lbs               | gph                    | lbs/day         | lbs        | lbs    | mum                 | сапк ррш          |
| 6/12/2010 | 162 | 0.00       | 514,934.55        |                        | 242,324.63      | 242,324.63 | 0.00   | 0.0000%             | 9.84678E-25       |
| 6/13/2010 | 163 | 0.00       | 514,934.55        | 1071.40308             | 220,680.98      | 220,680.98 | 0.00   | 0.0000%             | 5.21296E-25       |
| 6/14/2010 | 164 | 0.00       | 514,934.55        | 1033.27576             | 212,827.75      | 212,827.75 | 0.00   | 0.0000%             | 2.97888E-25       |
| 6/15/2010 | 165 | 0.00       | 514,934.55        | 1097.49463             | 226,055.16      | 226,055.16 | 0.00   | 0.0000%             | 1.74768E-25       |
| 6/16/2010 | 166 | 0.00       | 514,934.55        | 1117.60779             | 230,197.94      | 230,197.94 | 0.00   | 0.0000%             | 9.80453E-26       |
| 6/17/2010 | 167 | 0.00       | 514,934.55        | 1114.96497             | 229,653.59      | 229,653.59 | 0.00   | 0.0000%             | 5.42148E-26       |
| 6/18/2010 | 168 | 0.00       | 514,934.55        | 1055.06726             | 217,316.23      | 217,316.23 | 0.00   | 0.0000%             | 3.00358E-26       |
| 6/19/2010 | 169 | 0.00       | 514,934.55        | 922.881531             | 190,089.43      | 190,089.43 | 0.00   | 0.0000%             | 1.73599E-26       |
| 6/20/2010 | 170 | 0.00       | 514,934.55        | 906.076294             | 186,627.99      | 186,627.99 | 0.00   | 0.0000%             | 1.09514E-26       |
| 6/21/2010 | 171 | 0.00       | 514,934.55        | 818.307678             | 168,549.96      | 168,549.96 | 0.00   | 0.0000%             | 6.98229E-27       |
| 6/22/2010 | 172 | 0.00       | 514,934.55        | 889.664124             | 183,247.52      | 183,247.52 | 0.00   | 0.0000%             | 4.69683E-27       |
| 6/23/2010 | 173 | 0.00       | 514,934.55        | 834.013062             | 171,784.85      | 171,784.85 | 0.00   | 0.0000%             | 3.02539E-27       |
| 6/24/2010 | 174 | 0.00       | 514,934.55        | 852.242981             | 175,539.74      | 175,539.74 | 0.00   | 0.0000%             | 2.0161E-27        |
| 6/25/2010 | 175 | 0.00       | 514,934.55        | 899.142883             | 185,199.89      | 185,199.89 | 0.00   | 0.0000%             | 1.32882E-27       |
| 6/26/2010 | 176 | 0.00       | 514,934.55        | 799.173035             | 164,608.72      | 164,608.72 | 0.00   | 0.0000%             | 8.509E-28         |
| 6/27/2010 | 177 | 0.00       | 514,934.55        | 846.550049             | 174,367.15      | 174,367.15 | 0.00   | 0.0000%             | 5.78893E-28       |
| 6/28/2010 | 178 | 0.00       | 514,934.55        | 885.642761             | 182,419.22      | 182,419.22 | 0.00   | 0.0000%             | 3.82868E-28       |
| 6/29/2010 | 179 | 0.00       | 514,934.55        | 880.660522             | 181,393.01      | 181,393.01 | 0.00   | 0.0000%             | 2.47235E-28       |
| 6/30/2010 | 180 | 0.00       | 514,934.55        | 1077.67676             | 221,973.20      | 221,973.20 | 0.00   | 0.0000%             | 1.60143E-28       |
|           |     |            |                   |                        |                 |            |        |                     |                   |



# CITY OF PHILADELPHIA

DEPARTMENT OF PUBLIC HEALTH Donald F. Schwarz, MD, MPH Deputy Mayor for Health & Opportunity Health Commissioner

Nan Feyler, JD, MPH Chief of Staff

Air Management Services Thomas Huynh Director

Source Registration 321 University Avenue, 2nd Floor Philadelphia, PA 19104

Telephone (215) 685-7572 Fax (215) 685-7593

June 28, 2010

Mr. Paul Persing Sunoco, Inc. Margaret & Bermuda Streets Philadelphia, PA 19137-1193

PLID: 1551

RE: MACT Subpart EEE CPT Report for Boilers 1 and 2

Dear Mr. Persing,

The 40 CFR 63 Subpart EEE Comprehensive Performance Test (CPT) Report for Boilers 1 and 2 is acceptable to Air Management Services. The results show the following (emission limits from 40 CFR 63.1217(a) and (c)(1)):

| Pollutant                       | Test Results                   | Emission Limit             |
|---------------------------------|--------------------------------|----------------------------|
| Dioxins and Furans <sup>1</sup> | 1.0E-04 <sup>2</sup>           | Comply with CO or HC limit |
| Mercury                         | $3.2E-07 lbs/MMBTU^2$          | 4.2E-05 lbs/MMBTU          |
| Semivolatile Metals (Cd + Pb)   | 1.7E-06 lbs/MMBTU <sup>2</sup> | 8.2E-05 lbs/MMBTU          |
| Chromium                        | $3.1E-05 lbs/MMBTU^2$          | 1.3E-04 lbs/MMBTU          |
| Carbon Monoxide                 | 1.55 ppmv <sup>3</sup>         | 100 ppmv                   |
| Hydrocarbons                    | 0.67 ppmv <sup>3</sup>         | 10 ppiny                   |
| HCl + Chlorine                  | 9.0E-04 lbs/MMBTU <sup>2</sup> | 5.1E-02 lbs/MMBTU          |
| Particulate Matter              | $26.4^{3}$                     | 80 mg/dscm @ 7% O2         |
| MCB Destruction Efficiency      | >99.9996% <sup>3</sup>         | 99.99%                     |
| Phenol Destruction Efficiency   | 99.99980% <sup>3</sup>         | 99.99%                     |

<sup>&</sup>lt;sup>1</sup>Initial test required under 40 CFR 63.1207(a)(3). The higher emission condition is listed.

<sup>3</sup>From March 2009 performance test.

The results show that Sunoco was in compliance with all of the emission limits.

<sup>&</sup>lt;sup>2</sup>From July 2005 BIF Trial Burn, approved for Subpart EEE compliance test.



Macromedia flash Player 7.0

#### **RCRA Waste Management**

- WHAT IS HAZARDOUS WASTE?
- · in sufficient quantities and concentrations, pose a threat to human life, human health, or the environment when improperly stored, transported, treated or disposed.
- Regulations rely on a list of over 600 specific wastes. (Listed Waste- P, U, K, or F Codes)
- Other wastes are designated "hazardous" if they contain a characteristics. (Characteristic Waste - D code)

# Hazardous Waste Classification Process

- 1) Listed Waste a specific list of wastes from specific processes
  - 4 different lists:
  - a) F list common process wastes in various industries
  - b) K list specific wastes from specific industries ex: phenol residue - K022
  - c) P list discarded, unused commercial grade chemical d) U list products
  - products
  - ex: unused chemicals from spills, off spec
- 2) Characteristic Waste has properties
  - a) Ignitable
  - b) Corrosive
  - c) Reactive
  - d) Toxic
  - D Coded Waste

# **RCRA Waste Management**

- Characteristic Wastes are:
  - IGNITABLE combustible under certain conditions
  - CORROSIVE highly acidic, basic and/or capable of corroding metal
  - REACTIVE unstable under normal conditions and capable of creating explosions and/or toxic fumes, gases, and vapors when mixed with water
  - TOXIC harmful or fatal when ingested or absorbed

#### Listed Hazardous Waste

- I. Most common plant "Listed" waste in the plant is Phenol Residue
- II. Have a "K022" waste code on H. W. label.
- III. Examples of other listed wastes:
  - I. Boiler Brick & Ash: Boilers #1 & #2
  - 2. Residue Rags: Boilers #I & #2
  - 3. Phenol Residue Sludge
- IV. Must have "Poison" diamond on drum.

#### Characteristic Hazardous Waste

"Ignitable" Wastes - "Flammable Solids / Liquids"

- I. Have a "D001" waste code on label.
- II. Examples from this plant:
  - 1. Acetone Solids Includes Filters & Sludge
  - 2. AMS Filters / Sludge
  - 3. Cumene Sludge
- III. Liquid: Flash Point < 140 deg F</li>Solid: Spontaneous then burn VigorouslyGas: Compressed, Ignitable Gas

#### Characteristic Hazardous Waste

"Corrosive" Wastes - "Corrosive Liquids / Solids"

- I. Have a "D002" waste code on H.W. label.
- II. Examples from this plant:
  - 1. Caustic Filters
  - 2. Sulfuric Acid Tank Cleanout (Sludge & PPE)
- III. Aqueous: pH <=2 or pH >=12.5 Liquid: Corrodes metals at a specific rate.

#### Characteristic Hazardous Waste

"Reactive" Wastes - "Waste Organic Peroxide"

- I. Have a "D003" waste code on H.W. label.
- II. Examples from this plant:
  - 1. CHP Filters
  - 2. CHP spill cleanup material
- III. Unstable Undergoes Violent Changes Reacts with water Cyanide / Sulfide Bearing Explosive

# PaDEP Waste Management

- WHAT IS RESIDUAL WASTE?
- Residual waste is nonhazardous industrial waste. It includes waste material (solid, liquid or gas) produced by industrial, mining and agricultural operations. It excludes certain coal mining wastes and wastes from normal farming activities.
- EXAMPLES:
  - SOIL (Non-haz)

#### Waste Management

- Drummed waste handled as either residual or hazardous waste
- Both types of waste will always have:

  - Drum number
     Date on label when moved to drum park
- Residual waste

   May have DOT sticker if DOT shipping name is completed on waste label
- Hazardous Waste
- Always has DOT sticker





#### **Drum Handling Procedure**

- 1. Request empty drum from Drum Handler
- 2. Ensure drum is not corroded
- 3. Obtain correct labels from either routine waste stream labels at the foreman's office or contact Environmental Department for labels for non-routine waste
- 4. Log drum into log book

#### **Drum Logging Procedure**

5. Enter next sequential drum number in Waste Drum Logbook (Located outside

Foreman's office)

- 1. Date
- 2. Operator Initials
- 3. Type of Drum 17H (open top)/17E (sealed top)
- 4. Waste Type
- 5. Plant Location where drum is stored
- 6. Fill in column for your initials and date for moving to accumulation area only after drum is full and ready to be moved to the drum park

|           |                      | WAST                   | E DRUM AC    | TIVITY : OG (USE ON         | E LINE FOR             | REACH DHUM)   |          |
|-----------|----------------------|------------------------|--------------|-----------------------------|------------------------|---|----------|
| DATE TIME | OPERATOR<br>INITIALS | TYPE DRUM<br>(17H/57E) | LABEL<br>NO. | OF WASTE TO<br>BE COLLECTED | ACCUM<br>AREA<br>IDENT | INITIALIDATE DRUM ABBLED & READY TO MOVE TO DRUM PARK | COMMENTS |
| 2-1-60    | Teps                 | 17E                    | 6081         | Sport Frede                 | B/H                    |   |          |
| diaz      | R                    | 128                    | 1082         | Phone Street                | 118 140                | RG. 2/2/00  |          |
| 7.1       | 11                   | 11                     | 6085         | //                          | 11                     | //  |          |
|           |                      |                        | 6084         | L'                          | 1'                     |   |          |
| -2-00     | Jun                  | 17#                    | 1085         | OILV RAS                    | BOHER                  |   |          |
| 1/2/60    | 13.7m                | 175                    | 6086         | CHADSO TACS                 | 407-3                  |   |          |
| 13/20     | NC.                  | 12 H                   | 6087         | Bend Since                  | 18 An                  | R- 2/3/00   |          |
| 14/00     | me                   | 17.H                   | 1033         | Phone ( F. 14ms             | PR2-                   |   |          |
| 214166    | 146                  | 17.4                   | 6469         | thene here too              | 623                    | Sill  |          |
|           | 11C                  |                        | 6090         | Pract Rise best             |                        | JLC.  |          |
| 2/3/cc    | € 6                  | 17H                    | 6671         | The ritte                   |                        |   |          |
| 1.00      | 12                   |                        | 4092         | Que 1 Q Das                 | 2000                   | 1 1   |          |
|           |                      | 124                    | 6097         | BBY C                       | L+ 6/4 A               | Seif 2 1.00   |          |
|           |                      |                        | 608 cr       | 6,1                         |                        | <u> </u>  |          |
|           |                      |                        | 6695         |                             |                        |   |          |
| -1        |                      |                        | 6086         |                             |                        |   |          |
|           |                      |                        | 5077         |                             | -54                    |   |          |
|           |                      | -:-                    | 3070         |                             |                        | - :   |          |

FORM #538 REVISED REVISION #62

5:16/82 5:4/96

#### **Drum Logging Procedure (continued)**

- 7. Folders have appropriate labels and DOT labels for each routine plant waste types.
- 8. Place drum # on Haz Waste or Residual Waste label (Very Important!)

(Use Black "Sharpie" Marker - Not ball point pens)

- 9. Place appropriate DOT "Diamond" on drum. DOT diamond labels need to be clean, no markings, and whole with no torn corners.
- 10. Be sure to use plastic "bag" liners Existing drum:
- 11. Tighten and secure lid when drum is filled.
- 12. Place "Thank You" sticker on drum when filled.
  (Must have at least 2 inches of "head space") This will tell the drum handler that it is set to be moved to drum park

#### Drum Handling (Cont.)

- 13. Place date on label.
  - (Use Black "Sharpie" Permanent Ink Marker)
- 14. Go back to drum log book at Foreman's office and look up drum number. Put your initials and date in log book for when drum is full and ready to be moved to drum park

- If you have any questions or concerns about this CBL.
- · Please contact:
- · Environmental Department
- · 215 807 8442

# Roll-Offs Management

#### Introduction

- At Frankford Plant, roll-offs are used to accumulate large quantities of solid waste (e.g., excavated earth, debris, boiler bricks, etc.) generated during a construction project or maintenance activities.
- Typical waste stored in the roll-offs is Residual or Hazardous waste which is regulated by the state and federal rules and standards.
- Roll-offs meet the definition of containers under the state and federal rules.
- Hence. accumulation of residual and hazardous waste in roll-offs should follow the state and federal requirements for management of residual and hazardous waste in containers.

#### Roll-Off Management Procedure

- This procedure is prepared to outline the Frankford Plant's process of:

   Acquiring roll-offs to collect waste
  - · Managing roll-offs while on job site
  - Preparing roll-offs for off-site shipment
- The process defined in this procedure follows the state and federal requirements for accumulation of residual and hazardous waste in containers.

#### Roll-offs Management Procedure

- This procedure is available at the Frankford HES site at S@W under Environmental Waste procedures.
- It can be accessed by clicking on the button link below.
- Please read this procedure and take the test to complete the training.

CLICK HERE NOW to the brocedure

# Frankford Plant Universal Waste Management

Mercury-containing Bulbs

**Employee/Handler Training** 

#### Introduction

- <u>Universal Waste</u> is hazardous waste that is produced by a variety of businesses and institutions, not just in traditional industrial settings. Many of these wastes have been improperly managed in the past by being sent to solid waste landfills.
- The goal of the universal waste regulations is to improve the poor management of hazardous wastes.
- Universal wastes include:

  - Mercury-containing thermometers and thermostats
     Rechargeable batteries/Lead-acid batteries/Mercury-containing batteries/Lithium batteries
  - Mercury-containing lamps (fluorescent light tubes and high intensity discharge (HID) lamps)

# Agenda

•This training will focus on the proper disposal of Mercurycontaining lamps (fluorescent light tubes and high intensity discharge (HID) lamps).



#### **Labeling Universal Waste**

- •Universal waste can be stored on-site for a period of 1 year.
- •If universal waste is stored in a container, 1 label is sufficient for the waste inside of the container.
- •The date must be written on the label when the first piece of waste is placed in a container.

# One Example of a Universal Waste Label UNIVERSAL WASTE FEDERAL LAW PROHIBITS IMPROPER DISPOSAL HIS FOILOWING MATERIALS ARE REGULATED AS A UNIVERSAL WASTE - BATTERY UNIVERSAL WASTE - DESTIGIDE(S) UNIVERSAL WASTE - PROTECTEY THERMOSTAT(S) HALL PROPER SHIPPEN, NAME ANTI-ALERY AND WITH PREFEX REGULAR ANTI-ALERY CONTROL OF THE PROTECTED ANTI-ALERY AND ANTI-

| Another Example of a Universal<br>Waste Label   | · |
|---|---|
| UNIVERSAL WASTE  CONTENTS La LA ACCUMULATION START DATE 5-1-07 SHIPPER S. M. M. GARE  ADDRESS CITY, STATE, ZIP  Le taken Papers In.  Kloser In. 42.00 |   |
|   | 6 |

#### Storing Universal Waste

Mercury-containing Bulbs

- The I&E Department will manage the disposal of fluorescent bulbs.
- All fluorescent bulbs <u>must</u> be disposed of the in the containers in the CATOX substation.
  - The CATOX substation is the only acceptable place in the plant to dispose of fluorescent bulbs.
- If the fluorescent bulb has green writing stamped on it or has the word "Ecolux," then the bulb is considered to be "green" or environmentally friendly and does not need to be handled as a universal waste.

 If you have questions about universal waste disposal, contact the Environmental Department at extension 8518.

6

# **Custom Report - Selected Employees**

atr

There are 1093 training records for the selected criteria.

Period

29 Sep 2008

To 29 Sep 2010

| Employee:       | SULLIVAN, JACL   | YN ID Number:                              | Z15JRS            |                   |                |       |
|-----------------|------------------|--|-------------------|-------------------|----------------|-------|
| Curriculum Name | Course Name      | Task Name                                  | Task Type         | Status            | Completed Date | Grade |
| Direct Course   |                  |  |                   |                   |                |       |
|                 | FRK - EPA Univer | sal Waste 40CFR273                         | Course Status:    | Completed         |                |       |
|                 |                  | FRK - EPA Universal Waste                  | Challenge Test    | •                 | 01 Feb 2010    | 80    |
|                 |                  |  | •                 | •                 |                |       |
| Employee:       | Sweitzer, Mark   | ID Number:                                 | z17mas            |                   |                |       |
| Curriculum Name | Course Name      | Task Name                                  | Task Type         | Status            | Completed Date | Grade |
| Direct Course   |                  |  |                   |                   |                |       |
|                 | FRK - ENV - NPDE | S - RCRA Waste Management                  | Course Status:    | Completed         |                |       |
|                 |                  | FRK - ENV - NPDES RCRA Waste Management    | CBL               | Completed         | 20 Oct 2008    |       |
|                 |                  | FRK - ENV - NPDES RCRA Waste Management    | CBL               | Manually Exempted | d 20 Oct 2008  |       |
|                 |                  | FRK - NPDES - SARA - RCRA Waste Management | nt Challenge Test | Completed         | 20 Oct 2008    | 100   |
|                 |                  | FRK - NPDES - SARA - RCRA Waste Manageme   | nt Challenge Test | Manually Exempte  | d 20 Oct 2008  |       |
|                 | FRK - EPA Univer | sal Waste 40CFR273                         | Course Status:    | Completed         |                |       |
|                 |                  | FRK-EPA Universal Waste 40CFR273           | CBL               | Completed         | 02 Apr 2009    |       |
|                 |                  | FRK-EPA Universal Waste 40CFR273           | CBL               | Completed         | 17 Oct 2008    |       |
|                 |                  | FRK-EPA Universal Waste 40CFR273           | CBL               | Completed         | 11 Mar 2010    |       |
|                 |                  | FRK - EPA Universal Waste                  | Challenge Test    | Completed         | 02 Apr 2009    | 100   |
|                 |                  | FRK - EPA Universal Waste                  | Challenge Test    | Completed         | 17 Oct 2008    | 100   |
|                 |                  | FRK - EPA Universal Waste                  | Challenge Test    | Completed         | 11 Mar 2010    | 100   |
| Employee:       | TARRANT, CATH    | ERINE E ID Number:                         | Z01CET            |                   |                |       |
| Curriculum Name | Course Name      | Task Name                                  | Task Type         | Status            | Completed Date | Grade |
| Direct Course   |                  |  |                   |                   |                |       |
|                 | FRK - EPA Univer | sal Waste 40CFR273                         | Course Status:    | Completed         |                |       |
|                 |                  | FRK-EPA Universal Waste 40CFR273           | CBL               | Completed         | 21 Mar 2009    |       |
|                 |                  | FRK-EPA Universal Waste 40CFR273           | CBL               | Completed         | 23 Jan 2010    |       |
|                 |                  | FRK - EPA Universal Waste                  | Challenge Test    | •                 | 21 Mar 2009    | 100   |

Printed on: 29 Sep 2010

# **Custom Report - Selected Employees**

atr

Printed By: KOEHLER, EDWARD D.

There are 310 training records for the selected criteria.

Period

28 Sep 2009

To 28 Sep 2010

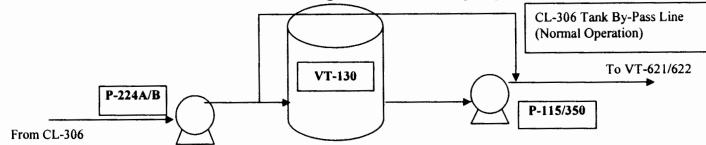
| Employee:       | STOFEY, HUYEN N        | ID Number:                            | Z01HXN             |           |                |       |
|-----------------|------------------------|---------------------------------------|--------------------|-----------|----------------|-------|
| Curriculum Name | Course Name            | Task Name                             | Task Type          | Status    | Completed Date | Grade |
| FRK-CHM-EPA 40  | CFR 262.34 265.16 RCRA |                                       | Curriculum Status: | Completed |                |       |
|                 | CHM EPA 40 CFR 26      | 62.34 265.16 RCRA                     |                    |           |                |       |
|                 |                        | CHM-T EPA 40 CFR 262.34 265.16 RCRA   | Challenge Test     | Completed | 01 Jan 2010    | 80    |
| Employee:       | SULLIVAN, JACLY        | N ID Number:                          | Z15JRS             |           |                |       |
| Curriculum Name | Course Name            | Task Name                             | Task Type          | Status    | Completed Date | Grade |
| FRK-CHM-EPA 40  | CFR 262.34 265.16 RCRA |                                       | Curriculum Status: | Completed |                |       |
|                 | CHM EPA 40 CFR 26      | 52.34 265.16 RCRA                     |                    |           |                |       |
|                 |                        | CHM-CBL EPA 40 CFR 262.34 265.16 RCRA | CBL                | Completed | 01 Feb 2010    |       |
|                 |                        | CHM-T EPA 40 CFR 262.34 265.16 RCRA   | Challenge Test     | Completed | 01 Feb 2010    | 100   |
| Employee:       | Sweitzer, Mark         | ID Number:                            | z17mas             |           |                |       |
| Curriculum Name | Course Name            | Task Name                             | Task Type          | Status    | Completed Date | Grade |
| FRK-CHM-EPA 40  | CFR 262.34 265.16 RCRA |                                       | Curriculum Status: | Completed |                |       |
|                 | CHM EPA 40 CFR 20      | 62.34 265.16 RCRA                     |                    |           |                |       |
|                 |                        | CHM-CBL EPA 40 CFR 262.34 265.16 RCRA | CBL                | Completed | 22 Feb 2010    |       |
|                 |                        | CHM-T EPA 40 CFR 262.34 265.16 RCRA   | Challenge Test     | Completed | 22 Feb 2010    | 90    |
| Employee:       | TARRANT, CATHE         | RINE E ID Number:                     | Z01CET             |           |                |       |
| Curriculum Name | Course Name            | Task Name                             | Task Type          | Status    | Completed Date | Grade |
| FRK-CHM-EPA 40  | CFR 262.34 265.16 RCRA |                                       | Curriculum Status: | Completed |                |       |
|                 | CHM EPA 40 CFR 2       | 62.34 265.16 RCRA                     |                    |           |                |       |
|                 |                        | CHM-CBL EPA 40 CFR 262.34 265.16 RCRA | CBL                | Completed | 23 Jan 2010    |       |
|                 |                        | CHM-T EPA 40 CFR 262.34 265.16 RCRA   | Challenge Test     | Completed | 23 Jan 2010    | 100   |
|                 |                        |                                       |                    |           |                |       |

Printed on: 28 Sep 2010

# Environmental/Hazardous Waste Pank Inspection & Pumping for VT-130







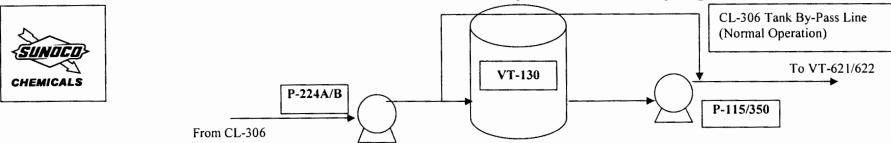
Note: This tank (VT-130) must be pumped completely empty every sixty(60) days.

All Yes and No need to be completed

| Section of     | Visible | e Leaks | Dike  |          | Dike D | rain Valve: | Cond  | lition of    | Tank OK?     | W/O Num   | ber  |
|----------------|---------|---------|-------|----------|--------|-------------|-------|--------------|--------------|-----------|------|
| Tank System    | or Sp   | ills?   | Condi | tion     | (√ Cł  | neck One)   | Inclu | de locati    | on of Needed | Date Ente | red: |
|                | 1       |         | Crack | s?       |        |             | Repa  | airs:        |              |           |      |
|                | 1       |         |       | ation?   |        |             | i.e.  |              |              |           |      |
|                | İ       |         |       | ekeeping |        |             |       | corrosic     |              |           |      |
|                | 1       |         | OK?   |          |        |             | 1     | t Condition  |              |           |      |
|                |         |         | (must |          |        |             | 1     | sual vent    | ing?         |           |      |
|                |         |         | compl | eted):   |        |             | Othe  |              |              |           |      |
|                |         |         |       |          |        |             |       | <del>\</del> | O Number     |           |      |
| Inlet Piping,  |         |         |       |          |        |             | (Yes) | ) No         |              |           |      |
| Pumps, etc.    | Yes     | ( No)   | Yes   | No       | Open   | Closed      |       |              |              | j         |      |
|                |         |         |       |          |        | &           |       |              |              |           |      |
| Tank Valves    |         | ~       |       |          |        | Locked      | Yes   | No           |              |           |      |
| & Piping       | Yes     | No      | Yes   | No       | Open   | Closed      | (162) | NO           |              | į         |      |
| a r iping      | 162     |         |       |          | Open   | &           |       |              |              | }         |      |
|                |         |         |       |          |        | Locked      | 1_    |              |              |           |      |
| Outlet Piping, |         |         | 1     |          |        | /[          | Yes   | No           |              |           |      |
| Pumps, etc.    | Yes     | No      | Yes   | No       | Open   | Closed      |       |              |              |           |      |
| •              |         |         |       |          | •      | &           |       |              |              |           |      |
|                |         |         |       |          |        | Locked      |       |              |              |           |      |

|           | Area Inspected By: | 1//_ | Date | : 11-15-69 | _Time: <u>/0</u> 00 |
|-----------|--------------------|------|------|------------|---------------------|
| Comments: |                    |      | -    | 7          |                     |
|           |                    |      |      |            |                     |
|           |                    |      |      |            |                     |

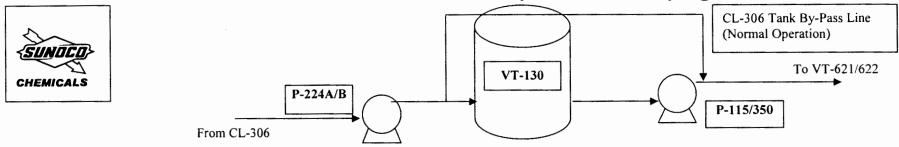




Note: This tank (VT-130) must be pumped completely empty every sixty(60) days.

| Section of<br>Tank System     | Visible Leaks<br>or Spills? |    | Dike Condition Cracks? Vegetation? Housekeeping OK? (must be completed): |    | Dike Drain Valve:<br>(√ Check One) |                       | Condition of Tank OK? Include location of Needed Repairs: i.e. Tank corrosion? Paint Condition? Unusual venting? Other? If so need W/O Number | W/O Number<br>Date Entered: |  |
|-------------------------------|-----------------------------|----|--|----|------------------------------------|-----------------------|---|-----------------------------|--|
| Inlet Piping,<br>Pumps, etc.  | Yes                         | No | Yes  | No | □<br>Open                          | Closed & Locked       | Yes No  |                             |  |
| Tank Valves<br>& Piping       | Yes                         | No | Yes  | No | □<br>Open                          | Closed & Locked       | Yes No  |                             |  |
| Outlet Piping,<br>Pumps, etc. | Yes                         | No | Yes  | No | Open                               | Closed<br>&<br>Locked | Yes No  |                             |  |

|           | Area Inspected By: | 1-2- | _Date: | 11-23-09 | Time: 1100 |  |
|-----------|--------------------|------|--------|----------|------------|--|
| Comments: |                    |      |        | ,        |            |  |
|           |                    |      | <br>   |          |            |  |
|           |                    |      | <br>   |          |            |  |
|           |                    |      | <br>   |          |            |  |

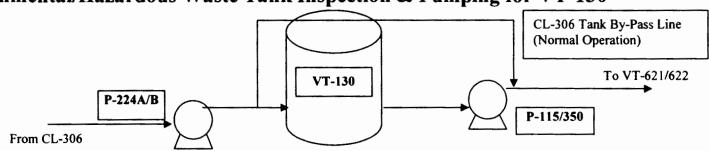


Note: This tank (VT-130) must be pumped completely empty every sixty(60) days.

| Section of     | Visible | Leaks | Dike            |          | Dike D        | rain Valve: | Condition of Tank OK?      | W/O Number    |
|----------------|---------|-------|-----------------|----------|---------------|-------------|----------------------------|---------------|
| Tank System    | or Spil | lls?  | Cond            | ition    | (√ Check One) |             | Include location of Needed | Date Entered: |
|                |         |       | Cracks?         |          |               |             | Repairs:                   |               |
|                |         |       | Vege            | tation?  |               |             | i.e.                       |               |
|                |         |       | Hous            | ekeeping |               |             | Tank corrosion?            |               |
|                |         |       | OK?             |          |               |             | Paint Condition?           |               |
|                |         |       | (mus            |          |               |             | Unusual venting?           |               |
|                |         |       | comp            | leted):  |               |             | Other?                     |               |
|                |         |       |                 |          |               |             | If so need W/O Number      |               |
| Inlet Piping,  |         |       | ł               |          |               |             | Yes Mo                     |               |
| Pumps, etc.    | Yes     | MO    | \<br>\<br>\<br> | /        | Open          | Closed      |                            |               |
|                |         | •     | Yes             | No       |               | &           |                            |               |
| Table          |         |       |                 |          |               | Locked      | V <sub>2</sub> A           |               |
| Tank Valves    |         | /     | Yes             | No       |               | <b>4</b> ∐  | Yes No                     |               |
| & Piping       | Yes     | Ŋσ    | 162             | No       | Open          | Closed      |                            | 1             |
|                |         |       |                 |          |               | &<br>Locked |                            |               |
| Outlet Piping, |         |       | <del> </del>    | -/       |               | 17          | Yes Mo                     |               |
| Pumps, etc.    | Yes     | Ŋ6    | Yes             | N6       | Open          | Closed      | 100 210                    |               |
| i dirips, etc. | 163     | 190   |                 |          | Open          | &           |                            |               |
|                |         |       |                 |          |               | Locked      |                            |               |

| Comments: | Area Inspected By: | Jye | Date: 12-13-09 Time: 130 |
|-----------|--------------------|-----|--------------------------|
|           |                    |     |                          |
|           |                    |     |                          |





Note: This tank (VT-130) must be pumped completely empty every sixty(60) days.

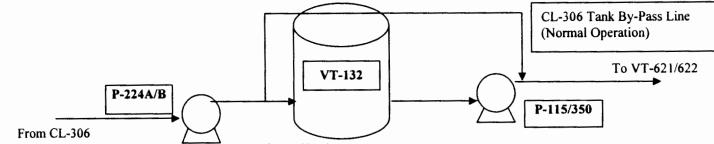
| Section of     | Visible | Leaks | Dike         | Dike D | rain Valve: | Condition of Tank OK?      | W/O Number    |
|----------------|---------|-------|--------------|--------|-------------|----------------------------|---------------|
| Tank System    | or Spi  | lls?  | Condition    | (√ Ch  | eck One)    | Include location of Needed | Date Entered: |
|                |         |       | Cracks?      |        |             | Repairs:                   |               |
|                |         |       | Vegetation?  |        |             | i.e.                       |               |
|                |         |       | Housekeeping |        |             | Tank corrosion?            |               |
|                | 1       |       | OK?          |        |             | Paint Condition?           |               |
|                |         |       | (must be     |        |             | Unusual venting?           | ļ             |
|                |         |       | completed):  |        |             | Other?                     |               |
|                |         |       |              |        |             | If so need W/O Number      |               |
| Inlet Piping,  |         |       | - 101        |        |             | Yes) (19)                  |               |
| Pumps, etc.    | Yes     | No    | (es) (###)   | Open   | Closed      | C YM                       |               |
|                |         |       | 440          |        | &           |                            |               |
|                | ļ       |       |              |        | Locked      | a Mila                     |               |
| Tank Valves    |         |       |              |        |             | Yes Man                    |               |
| & Piping       | Yes     | (No)  | (Yes)        | Open   | Closed      |                            |               |
|                |         |       | 701          |        | č.          |                            |               |
| Outlet Dining  | -       |       | 1004         |        | Locked      | Vac Mills                  |               |
| Outlet Piping, | Vaa     | No    | Yes Man      |        |             | Yes) (MA)                  |               |
| Pumps, etc.    | Yes     | NO    |              | Open   | Closed      |                            |               |
|                |         |       | 1001         |        | Locked      |                            |               |
|                | 1       |       |              |        |             | <del></del>                |               |

| Comments: | Area Inspected By: | 2981 | Date:_ | 12/2 | 21/09 | Time:/_ | 500 |
|-----------|--------------------|------|--------|------|-------|---------|-----|
| Comments: |                    |      |        |      |       |         |     |
|           |                    |      |        |      |       |         |     |
|           |                    |      |        |      |       |         |     |

#### Attachment #13







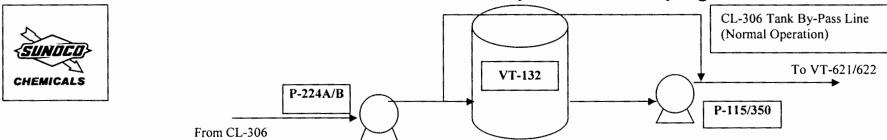
Note: This tank (VT-132) must be pumped completely empty every sixty(60) days.

| Castian of     |         |              |         |          | Dika              | rain Makes | Candi                      | tion of Tonk OK2 | W/O Number    |
|----------------|---------|--------------|---------|----------|-------------------|------------|----------------------------|------------------|---------------|
| Section of     | l .     | Leaks        | Dike    |          | Dike Drain Valve: |            | Condition of Tank OK?      |                  |               |
| Tank System    | or Spil | lls?         | Cond    | ition    | (√ Check One)     |            | Include location of Needed |                  | Date Entered: |
|                |         |              | Cracks? |          |                   |            |                            | irs:             |               |
|                |         |              | Vege    | tation?  |                   |            | i.e.                       |                  |               |
|                | ļ       |              |         | ekeeping |                   |            | 1                          | corrosion?       |               |
| ĺ              |         |              | OK?     | ckeeping |                   |            |                            | Condition?       |               |
|                | l       |              |         |          |                   |            |                            |                  |               |
|                |         |              | (mus    |          |                   |            | 1                          | ual venting?     | İ             |
|                |         |              | comp    | leted):  |                   |            | Other                      |                  |               |
|                |         |              |         |          |                   |            | If so r                    | eed W/O Number   |               |
| Inlet Piping,  |         |              | 0       |          |                   | Ø          | Yes                        | No               |               |
| Pumps, etc.    | Yes     | No           | Yes     | No       | Open              | Closed     |                            |                  |               |
|                |         | (")          |         |          |                   | &          |                            |                  |               |
|                |         | $\bigcirc$   |         |          |                   | Locked     |                            |                  |               |
| Tank Valves    |         | 2            | $\prod$ |          |                   | Ø          | Yes                        | No               |               |
| & Piping       | Yes     | (Ng          | Yes     | No       | Open              | Closed     |                            |                  |               |
| , p            |         |              |         |          |                   | &          |                            |                  |               |
|                | ĺ       |              |         |          |                   | Locked     |                            |                  |               |
| Outlet Piping, |         |              | 17      |          |                   | Z          | Yes                        | No               |               |
| Pumps, etc.    | Yes     | Ng           | Yes     | No       | Open              | Closed     |                            | /                |               |
|                | . 55    | $\mathbf{U}$ |         |          | JP4               | 2          |                            |                  |               |
|                |         |              |         |          |                   | Locked     |                            |                  |               |
| <del></del>    |         |              | ┸       |          |                   | 200.104    |                            |                  | 1             |

| Comments: | Area Inspected By: | fl- | Date: 11-15-05 | Time: /000 |
|-----------|--------------------|-----|----------------|------------|
|           |                    |     | <br>           |            |
|           |                    |     | <br>           |            |







**Note:** This tank (VT-132) must be pumped completely empty every sixty(60) days.

| All Ics and I  |         |       |       |          |               |                  |                            |               |
|----------------|---------|-------|-------|----------|---------------|------------------|----------------------------|---------------|
| Section of     | Visible | Leaks | Dike  |          |               | rain Valve:      | Condition of Tank OK?      | W/O Number    |
| Tank System    | or Spil | lls?  | Condi | tion     | (√ Check One) |                  | Include location of Needed | Date Entered: |
|                |         |       | Crack | s?       |               |                  | Repairs:                   |               |
|                |         |       | Veget | ation?   |               |                  | i.e.                       |               |
|                |         |       | House | ekeeping |               |                  | Tank corrosion?            | 1             |
|                |         |       | OK?   |          |               |                  | Paint Condition?           |               |
|                |         |       | (must | be       |               |                  | Unusual venting?           |               |
|                |         |       | compl | eted):   |               |                  | Other?                     |               |
|                |         |       |       | ŕ        |               |                  | If so need W/O Number      |               |
| Inlet Piping,  |         |       |       |          |               | - I              | Yes (No)                   |               |
| Pumps, etc.    | Yes     | No    |       |          | Open          | Closed           |                            |               |
|                |         |       | Yes   | No       |               | &                |                            |               |
|                |         |       |       |          |               | Locked           |                            |               |
| Tank Valves    |         | 6     |       |          |               |                  | Yes No                     |               |
| & Piping       | Yes     | /No   | Yes   | No       | Open          | Closed           |                            |               |
|                |         |       |       |          |               | &                |                            |               |
| 0 11 1 5: :    |         |       |       |          |               | Locked           |                            |               |
| Outlet Piping, |         |       | 1     | Al a     |               |                  | Yes (No)                   |               |
| Pumps, etc.    | Yes     | No    | Yes   | No       | Open          | Closed           |                            |               |
|                |         |       |       |          |               | &<br>1. a a land |                            |               |
|                |         |       |       |          |               | Locked           |                            |               |

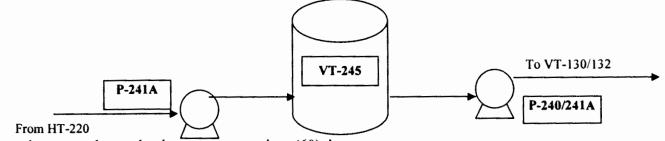
|           | Area Inspected By: | Date: //-23-69 | Time: /100 |
|-----------|--------------------|----------------|------------|
| Comments: |                    |                |            |
|           |                    |                |            |
|           |                    |                |            |

#### Attachment #14





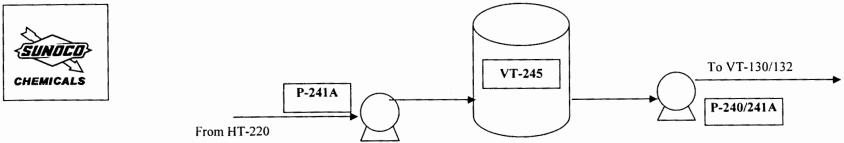




Note: This tank (VT-245) must be pumped completely empty every sixty (60) days.

| Section of     | Visibl       | e Leaks                                 | Dike         | Dike D       | rain Valve:  | Cond               | lition of Tank OK?    | W/O Number    |
|----------------|--------------|---|--------------|--------------|--------------|--------------------|-----------------------|---------------|
| Tank System    | or Sp        | ills?                                   | Condition    | (√ Ch        | eck One)     | Inclu              | de location of Needed | Date Entered: |
|                | ]            |   | Cracks?      |              |              |                    | airs:                 |               |
|                |              |   | Vegetation?  |              |              | i.e.               |                       |               |
|                |              |   | Housekeeping | 3            |              | Tank               | corrosion?            |               |
|                |              |   | OK?          |              |              | 1                  | t Condition?          |               |
|                |              |   | (must be     |              |              |                    | sual venting?         |               |
|                | 1            |   | completed):  |              |              | Othe               |                       |               |
|                |              |   |              |              |              | I <del>I s</del> Q | need W/O Number       |               |
| Inlet Piping,  |              |   |              |              |              | Yes                | ) No                  |               |
| Pumps, etc.    | Yes          | (No)                                    | Yes ) No     | Open         | Closed \     | $\bigvee$          | /                     |               |
|                | ļ            |   |              |              | <b>&amp;</b> |                    |                       |               |
| Tank Valves    | <del> </del> |   |              | <del> </del> | Locked       | Yes                | \ No                  |               |
|                | Vaa          | $\left( \mathbf{N}_{\mathbf{a}}\right)$ | Yes No       | 0            |              | res                | ) No                  |               |
| & Piping       | Yes          | (No                                     | (165)        | Open         | Closed       |                    | /                     |               |
| ŀ              |              |   |              |              | Locked       |                    |                       |               |
| Outlet Piping, |              |   | A            |              | 1            | Yes                | No                    |               |
| Pumps, etc.    | Yes          | No                                      | Yes) No      | Open         | Closed       | $\mathbb{C}^{2}$   | )                     |               |
|                |              |   |              |              | &            |                    |                       |               |
|                |              |   |              |              | Locked       |                    |                       |               |

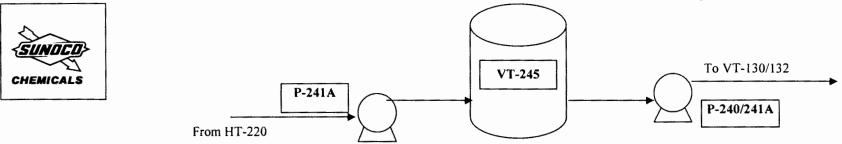
|           | Area Inspected By: |  | Date: //-/5-09                          | Time: /000 |
|-----------|--------------------|--|---|------------|
| Comments: |                    |  | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |            |
|           |                    |  |   |            |
|           |                    |  |   |            |



Note: This tank (VT-245) must be pumped completely empty every sixty(60) days.

| Section of     |              | e Leaks | Dike  |         | Dike Di | rain Valve: | Condition of Tank OK?      | W/O Number    |
|----------------|--------------|---------|-------|---------|---------|-------------|----------------------------|---------------|
| Tank System    | or Spi       |         | Condi | tion    |         | eck One)    | Include location of Needed | Date Entered: |
| ,              |              |         | Crack | s?      | `       | •           | Repairs:                   |               |
|                |              |         | Veget | ation?  |         |             | i.e.                       |               |
|                | ļ            |         | _     | keeping |         |             | Tank corrosion?            |               |
|                |              |         | OK?   |         |         |             | Paint Condition?           |               |
|                |              |         | (must | be      |         |             | Unusual venting?           |               |
|                |              |         | compl | eted):  |         |             | Other?                     |               |
|                |              |         |       |         |         |             | If so need W/O Number      |               |
| Inlet Piping,  |              |         |       |         |         | B           | Yes (No)                   |               |
| Pumps, etc.    | Yes          | (No)    |       | A1 -    | Open    | Closed      |                            |               |
|                |              |         | Yes   | No      |         | &           |                            |               |
|                |              |         |       |         |         | Locked      | W (3)                      |               |
| Tank Valves    |              |         | Vac   | No      |         |             | Yes No                     |               |
| & Piping       | Yes          | (No)    | (Yes) | No      | Open    | Closed      |                            |               |
|                |              |         |       |         |         | &<br>Locked |                            |               |
| Outlet Piping, | <del> </del> |         |       |         |         | LOCKEG      | Yes No                     |               |
| Pumps, etc.    | Yes          | No      | Yes   | No      | Open    | Closed      | 100                        |               |
| i umps, etc.   | 163          |         |       |         | Open    | &           |                            |               |
|                |              |         |       |         |         | Locked      |                            |               |

| Area Inspected By:  Comments: | Date:_ | 11-23-09 | Time: //00 |
|-------------------------------|--------|----------|------------|
|                               |        |          |            |



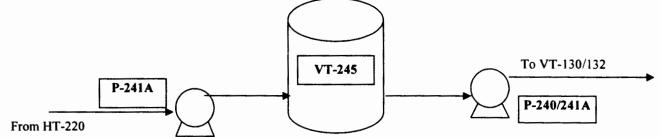
Note: This tank (VT-245) must be pumped completely empty every sixty(60) days.

| All res and r  |           |           |      |              | ·      |              | 1                          |                   |
|----------------|-----------|-----------|------|--------------|--------|--------------|----------------------------|-------------------|
| Section of     | Visible   | Leaks     | Dike |              | Dike [ | Orain Valve: | Condition of Tank OK?      | W/O Number        |
| Tank System    | or Spil   | ls?       | Cond | lition       | (√CI   | neck One)    | Include location of Needed | Date Entered:     |
| •              |           |           | Crac | ks?          |        |              | Repairs:                   |                   |
|                |           |           | 1    | etation?     |        |              | i.e.                       |                   |
|                |           |           | , -  | sekeeping    |        |              | Tank corrosion?            |                   |
|                |           |           | OK?  |              | i      |              | Paint Condition?           |                   |
|                |           |           |      |              |        |              |                            |                   |
|                |           |           | 1    | st be        |        |              | Unusual venting?           |                   |
|                |           |           | comp | oleted):     |        |              | Other?                     |                   |
|                |           |           |      |              |        |              | If so need W/O Number      |                   |
| Inlet Piping,  |           | _         |      | _            |        |              | Yes No                     |                   |
| Pumps, etc.    | Yes       | No        |      |              | Open   | Closed       | ·                          |                   |
| • •            |           |           | Yes  | Мo           | ١.     | &            |                            | 1                 |
|                |           |           |      |              |        | Locked       |                            |                   |
| Tank Valves    |           |           |      |              |        | 7            | Yes No                     |                   |
| & Piping       | Yes       | Mo        | Yes  | No           | Open   | Closed       |                            |                   |
| αpg            | 1.00      |           |      |              | Орон   | &            |                            |                   |
|                |           |           |      |              |        | Locked       |                            |                   |
| Outlet Piping, |           |           |      |              |        | 6            | Yes No                     |                   |
| Pumps, etc.    | Yes       | No        | Yes  | No           | Open   | Closed       | 1.00                       |                   |
| i dirips, ctc. | 163       | ую        |      | <i>y</i> . • | Open   | &            |                            |                   |
|                |           |           |      | $\sim$       |        | Locked       |                            |                   |
|                |           |           |      | 7            | 1      |              |                            |                   |
|                | Area Insp | ected By: |      | ( ) 110      | -      |              | Date: ) 2                  | -13.09 Time: 1300 |
| Comments:      |           |           |      | $\vee$       |        |              |                            |                   |
|                |           |           |      | -            | •      |              |                            |                   |

## 0

# Environmental/Hazardous Waste Tank Inspection & Pumping for VT-245



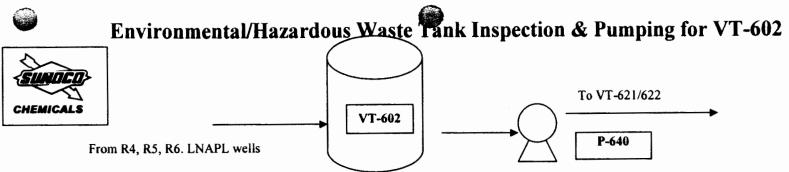


Note: This tank (VT-245) must be pumped completely empty every sixty (60) days.

| All 1 es allu Iv | o mode to so o | Jimpiotou    |                   |                            |               |
|------------------|----------------|--------------|-------------------|----------------------------|---------------|
| Section of       | Visible Leaks  | Dike         | Dike Drain Valve: | Condition of Tank OK?      | W/O Number    |
| Tank System      | or Spills?     | Condition    | (√ Check One)     | Include location of Needed | Date Entered: |
|                  |                | Cracks?      |                   | Repairs:                   |               |
|                  |                | Vegetation?  |                   | i.e.                       |               |
|                  |                | Housekeeping |                   | Tank corrosion?            |               |
|                  |                | OK?          |                   | Paint Condition?           | i             |
|                  |                | (must be     |                   | Unusual venting?           |               |
|                  |                | completed):  |                   | Other?                     |               |
|                  |                | , ,          |                   | If so need W/O Number      |               |
| Inlet Piping,    |                |              |                   | Yes No                     |               |
| Pumps, etc.      | Yes No         | (Yes) No     | Open Closed       |                            |               |
|                  |                |              | &                 |                            |               |
|                  |                |              | Locked            |                            |               |
| Tank Valves      |                |              |                   | No No                      |               |
| & Piping         | Yes (No)       | (Yes) No     | Open Closed       |                            |               |
|                  |                |              | &                 | İ                          |               |
|                  |                |              | Locked            |                            |               |
| Outlet Piping,   |                |              |                   | Yes No                     |               |
| Pumps, etc.      | Yes (No)       | Yes No       | Open Closed       |                            |               |
|                  |                |              | &                 |                            |               |
|                  |                |              | Locked            |                            | <u></u>       |

| Area Inspected By: | 2981 | Date: | 12/21/09 | Time: | 1500 |
|--------------------|------|-------|----------|-------|------|
| Comments:          |      |       | ' /      |       |      |
|                    |      |       |          |       |      |
|                    |      |       |          |       |      |
|                    |      |       |          |       |      |

#### **Attachment #15**

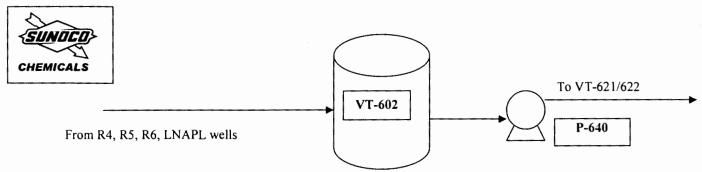


Note: This tank (VT-602) must be pumped completely empty every sixty (60) days.

| Section of     | Visible  | Leaks        | Dike  |          | Dike D | rain Valve:  |       | lition of Tank OK?    | W/O Number    |
|----------------|----------|--------------|-------|----------|--------|--------------|-------|-----------------------|---------------|
| Tank System    | or Spi   | lls?         | Condi | ition    | (√ Ch  | eck One)     | Inclu | de location of Needed | Date Entered: |
| •              |          |              | Crack | s?       |        |              | Repa  | nirs:                 |               |
|                |          |              | Veget | ation?   |        |              | i.e.  |                       |               |
|                |          |              | House | ekeeping |        |              | Tank  | corrosion?            |               |
|                |          |              | OK?   |          |        |              | Paint | t Condition?          |               |
|                |          |              | (mus  | t be     |        |              | Unus  | sual venting?         |               |
|                |          |              | comp  | leted):  |        |              | Othe  | r?                    |               |
|                |          |              | ,     | •        |        |              | JF 80 | need W/O Number       |               |
| Inlet Piping,  |          |              |       |          |        | D .          | Yes)  | No                    |               |
| Pumps, etc.    | Yes      | No /         | Yes)  | No       | Open   | Closed       |       |                       |               |
| -              |          |              |       |          |        | &            |       |                       |               |
|                | <u> </u> |              |       |          |        | Locked       |       |                       |               |
| Tank Valves    |          | $\hat{\sim}$ |       |          |        | Ø            | (Yes) | No                    |               |
| & Piping       | Yes      | Ng           | Yes   | No       | Open   | Ćlosed       |       |                       |               |
|                |          | $\cup$       |       |          |        | <b>&amp;</b> |       |                       |               |
| Outlet Dining  | <u> </u> |              |       |          |        | Locked       | (     |                       |               |
| Outlet Piping, |          |              | Yes   | No       |        | ٠ ممر        | Yes   | No                    |               |
| Pumps, etc.    | Yes      | No)          | (168  | NO       | Open   | ∕2losed<br>& |       |                       |               |
|                |          | $\cup$       |       |          |        | Locked       |       |                       |               |
|                |          |              | L     | . 1      | L      | LUCKOU       |       |                       | 1             |

| Comments: | Area Inspected By: | <i>f/L</i> | Date: 11-15-09 | _Time: <u>/ ○ ∞</u> |
|-----------|--------------------|------------|----------------|---------------------|
|           |                    |            |                |                     |
|           |                    |            | <br>           |                     |





Note: This tank (VT-602) must be pumped completely empty every sixty(60) days.

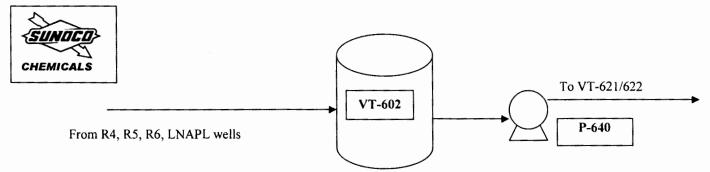
| Section of     | Visibl | e Leaks | Dike         | Dike D | rain Valve: | Condition of Tank OK?                 | W/O Number    |
|----------------|--------|---------|--------------|--------|-------------|---------------------------------------|---------------|
| Tank System    | or Sp  | ills?   | Condition    | (√Ch   | eck One)    | Include location of Needed            | Date Entered: |
|                |        |         | Cracks?      |        |             | Repairs:                              |               |
|                |        |         | Vegetation?  |        |             | i.e.                                  |               |
|                |        |         | Housekeeping |        |             | Tank corrosion?                       |               |
|                |        |         | OK?          |        |             | Paint Condition?                      |               |
|                |        |         | (must be     |        |             | Unusual venting?                      |               |
|                |        |         | completed):  |        |             | Other?                                |               |
|                |        |         | l            |        |             | If so need W/O Number                 |               |
| Inlet Piping,  |        |         |              |        | B           | Yes No                                |               |
| Pumps, etc.    | Yes    | (No)    |              | Open   | Closed      |                                       |               |
|                |        |         | Yes No       |        | &           |                                       |               |
|                |        |         |              |        | Locked      |                                       |               |
| Tank Valves    | }      | 61      |              |        | 1           | Yes (No)                              |               |
| & Piping       | Yes    | /No)(   | Yes) No      | Open   | Closed      |                                       |               |
|                |        |         |              |        | &           |                                       |               |
| 0 11 1 5       |        |         |              | -      | Locked      | \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ |               |
| Outlet Piping, |        |         | Yes No       |        | <u> </u>    | Yes No                                |               |
| Pumps, etc.    | Yes    | No)     | Yes No       | Open   | Closed      |                                       |               |
|                |        |         |              |        | &<br>Locked |                                       |               |
| L              |        |         |              |        | LOCKEU      |                                       |               |

| Area Inspected By: | Date: 11-23-09 Time:)100 |
|--------------------|--------------------------|
| Comments:          |                          |





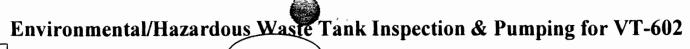


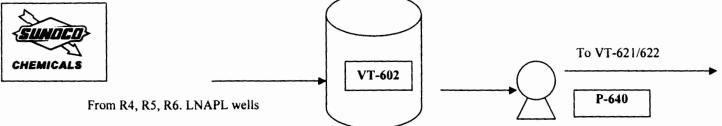


Note: This tank (VT-602) must be pumped completely empty every sixty(60) days.

| Section of     | Visible   | Leaks                                 | Dike     |           | Dike D   | rain Valve:   | Cond     | Condition of Tank OK? W/O Number |          |             | er       |
|----------------|-----------|---------------------------------------|----------|-----------|----------|---------------|----------|----------------------------------|----------|-------------|----------|
| Tank System    | or Spil   | ls?                                   | I .      | Condition |          | (√ Check One) |          | Include location of Needed       |          | Date Entere | ed:      |
|                |           |                                       | Cracks?  |           |          |               |          | irs:                             |          |             |          |
|                |           |                                       | Vege     | tation?   |          |               | i.e.     |                                  |          |             |          |
|                |           |                                       | Hous     | ekeeping  |          |               | Tank     | corrosion?                       |          |             |          |
|                |           |                                       | OK?      |           |          |               | Paint    | Condition?                       |          |             |          |
|                |           |                                       | (mus     | st be     |          |               | Unus     | ual venting                      | ?        |             |          |
|                |           |                                       | comp     | oleted):  |          |               | Other    | ?                                |          |             |          |
|                |           |                                       |          |           |          |               | If so r  | need W/O N                       | Number   |             |          |
| Inlet Piping,  |           |                                       | -        |           |          | <u> </u>      | Yes      | Nø                               |          |             |          |
| Pumps, etc.    | Yes       | No                                    |          | /         | Open     | Closed        | }        |                                  |          |             |          |
| -              |           |                                       | Yes      | No        | _        | &             |          |                                  |          |             |          |
|                |           |                                       |          |           |          | Locked        | <u> </u> |                                  |          |             |          |
| Tank Valves    |           |                                       | ł.,      | /         |          |               | Yes      | No                               |          |             |          |
| & Piping       | Yes       | Mб                                    | Yes      | No        | Open     | Closed        |          |                                  |          |             |          |
|                |           | •                                     |          | _         |          | &             |          | _                                |          |             |          |
|                |           |                                       | ļ        |           |          | Locked        |          |                                  |          |             |          |
| Outlet Piping, |           |                                       | 1,       | ./        |          | (A)           | Yes      | Ņб                               |          |             |          |
| Pumps, etc.    | Yes       | N6                                    | Yes      | No        | Open     | Closed        | 1        |                                  |          |             |          |
|                |           |                                       | i .      |           |          | &             | 1        |                                  |          |             |          |
|                |           |                                       | <u> </u> | 1         | <u> </u> | Locked        | J        |                                  |          | <u> </u>    |          |
|                | Area Insr | ected By:                             | (        | ナベレ       | ₹        |               |          |                                  | Date: 12 | -13-29      | Cime: 13 |
| Comments:      |           | , , , , , , , , , , , , , , , , , , , |          | /         |          |               |          |                                  |          |             | 1        |

|                               | Environme  | ntal/Hazardo   | us Was    | te Tank I                | nspecti   | on & Pumping fo                        | r VT-602                    |
|-------------------------------|--|--|-----------|--------------------------|---|--|-----------------------------|
| Note: This tank (V            | From R4, R5, R6. LNA T-602) must be pumpe need to be compl | d completely empty ev  | VT-602    |                          | <b>-</b>  | To VT-621/622 P-640                    | - <b>→</b>                  |
| Section of<br>Tank System     | Visible Leaks<br>or Spills?                                | Dike Condition Cracks? Vegetation? Housekeeping OK? (must be completed): |           | rain Valve:<br>leck One) | Include<br>Repairs<br>i.e.<br>Tank c<br>Paint C<br>Unusus<br>Other? | orrosion?<br>Condition?<br>al venting? | W/O Number<br>Date Entered: |
| Inlet Piping,<br>Pumps, etc.  | Yes (No  | Yes No   | □<br>Open | Closed & Locked          | _   | No                                     |                             |
| Tank Valves<br>& Piping       | Yes No   | Yes No   | Open      | Closed & Locked          | Yes   | No                                     |                             |
| Outlet Piping,<br>Pumps, etc. | Yes No   | Yes No   | □<br>Open | Closed & Locked          | Yes   | No                                     |                             |
| Comments:                     | Area Inspected By:   | 2981   |           |                          |   | Date: /2/                              | /21/09 Time: 1-             |



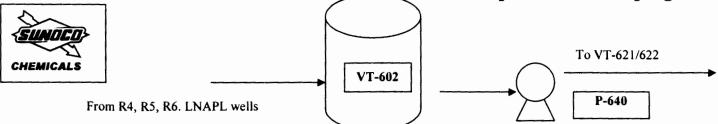


Note: This tank (VT-602) must be pumped completely empty every sixty (60) days.

| All Yes and No |  |           |      |           |        |              |  |                |        |             | <del></del> |
|----------------|--|-----------|------|-----------|--------|--------------|--|----------------|--------|-------------|-------------|
| Section of     | Visible  | Leaks     | Dike |           | Dike D | rain Valve:  | Conc   | dition of Tank | COK?   | W/O Num     | nber        |
| Tank System    | or Spil  | ls?       | Cond | dition    | (√ Ct  | neck One)    | Include location of Needed                       |                |        | Date Ente   | ered:       |
| •              |  |           | Crac | ks?       | ,      | 11           |  | Repairs:       |        |             |             |
|                | 1  |           |      | etation?  |        |              | i.e.   |                |        | 1           |             |
|                |  |           |      | sekeeping |        |              |  | corrosion?     |        |             |             |
|                |  |           |      |           |        |              |  |                |        |             |             |
|                |  |           | OK?  |           |        |              | 1  | t Condition?   |        |             |             |
|                | 1  |           | , `  | st be     |        |              | 1  | sual venting?  |        |             |             |
|                |  |           | com  | oleted):  |        |              | Othe   | τ?             |        |             |             |
|                | }  |           |      |           |        |              | If so  | need_W/O N     | umber  |             |             |
| Inlet Piping,  |  |           |      |           |        |              | Yes  |                |        |             |             |
| Pumps, etc.    | Yes  | No        | Yes  | (No )     | Open   | Closed       |  |                |        |             |             |
| i unips, etc.  | 163  |           | 1    |           | Open   | &            |  |                |        |             |             |
|                |  |           | İ    | ` _       |        | Locked       | 1  |                |        |             | 1           |
| Tank Valves    | <del>                                     </del> |           |      |           |        | D/           | Yes  | No             |        | 1           |             |
|                | Vaa  | (10)      | Yes  | (No)      |        | _            | 163  |                |        |             | }           |
| & Piping       | Yes  | (No)      | 103  |           | Open   | Closed       | 1  |                |        |             |             |
|                | 1  |           | l    | , •       |        | Os<br>Lookod | 1  |                |        |             | }           |
| 0 11 1 5: :    |  |           |      |           |        | Locked       | <del>                                     </del> | <del></del>    |        | <del></del> |             |
| Outlet Piping, |  | i         |      |           |        |              | Yes  | No             |        |             | }           |
| Pumps, etc.    | Yes  | No/       | Yes  | (No)      | Open   | Closed       | 1  |                |        |             |             |
|                |  |           |      | •         |        | &            | 1  |                |        |             |             |
| <br>           | <u> </u>   |           |      |           |        | Locked       |  |                |        | 1,//        |             |
|                |  |           |      |           | ٨      |              |  |                | ,      | alchen      |             |
|                | Area Insp  | ected By: |      |           | //     | me-          | ··   |                | _Date: | 107/10      | _Time:      |
| Comments:      |  |           |      |           | / [    |              |  |                | l      | ,           |             |
|                |  |           |      |           | ι      |              |  |                |        |             |             |

|           | Area Inspected By: | Male | Date: 9/19/10' Time: |
|-----------|--------------------|------|----------------------|
| Comments: |                    |      | , ,                  |
|           |                    |      |                      |
|           |                    |      |                      |





Note: This tank (VT-602) must be pumped completely empty every sixty (60) days.

| Section of     | Visible     | e Leaks | Dike  |           |      | rain Valve:   | Cond         | ition of Tank OK?     | W/O Number    |
|----------------|-------------|---------|---|-----------|------|---------------|--------------|-----------------------|---------------|
| Tank System    | or Spi      | ills?   |   | Condition |      | (√ Check One) |              | de location of Needed | Date Entered: |
|                | İ           |         | Cracl   |           |      |               | Repa         | irs:                  |               |
|                |             |         |   | tation?   |      |               | i.e.         |                       |               |
|                |             |         |   | ekeeping  |      |               | l .          | corrosion?            |               |
|                | 1           |         | OK?   | •         |      |               | t .          | Condition?            |               |
|                | ł           |         | 1 '   | st be     |      |               | 1            | ual venting?          |               |
|                |             |         | comp  | oleted):  |      |               | Other        |                       |               |
|                |             |         |   |           |      |               | If so r      | need W/O Number       |               |
| Inlet Piping,  |             |         | \<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\<br>\ |           |      |               | Yes          | No                    |               |
| Pumps, etc.    | Yes         | No      | Yes   | No        | Open | Closed        | İ            | ,                     |               |
|                |             | ,       |   |           |      | Locked        |              |                       |               |
| Tank Valves    |             |         |   |           |      | P             | Yes          | No                    |               |
| & Piping       | Yes         | No      | Yes   | No.       | Open | Closed        |              | 7                     |               |
|                |             |         | ł   |           |      | &             |              |                       |               |
| <u> </u>       | <del></del> |         | <u> </u>  |           |      | Locked        | <del> </del> |                       |               |
| Outlet Piping, |             | /       | Vac   |           |      | Ø             | Yes          | No                    |               |
| Pumps, etc.    | Yes         | No      | Yes   | No        | Open | Closed        |              | ,                     |               |
|                |             | ,       |   | -         |      | č.            |              |                       |               |
|                | L           |         | L   |           |      | Locked        |              |                       |               |

| rumps, etc. | res           |       | 103 | <i>)</i> ,,, | Open | &<br>Locked | · |           |                  |    |
|-------------|---------------|-------|-----|--------------|------|-------------|---|-----------|------------------|----|
| Comments:   | Area Inspecte | d By: | -2  | 110)         |      |             |   | Date: 9-3 | 2.C. 10 Time: 7. | کن |
|             |               |       |     |              |      |             |   |           |                  |    |
|             |               |       |     |              |      |             |   |           |                  |    |